

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

COMMITTEE ON THE JUDICIARY,
UNITED STATES HOUSE OF
REPRESENTATIVES,

Plaintiff,

v.

DONALD F. MCGAHN II,

Defendant.

No. 19-cv-2379 (KBJ)

**PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION
OR, IN THE ALTERNATIVE, FOR EXPEDITED PARTIAL SUMMARY JUDGMENT**

Plaintiff moves for a preliminary injunction pursuant to Federal Rule of Civil Procedure 65(a) or, in the alternative, for partial summary judgment pursuant to Federal Rule of Civil Procedure 56(a), on the preliminary injunction schedule, *see* LCvR 65.1(c), (d), or on an otherwise expedited schedule ordered by the Court. Plaintiff's motion is based on the attached memorandum of law, Declaration of Barry H. Berke (Aug. 26, 2019), Declaration of Todd B. Tatelman, statement of material facts as to which Plaintiff contends there is no genuine issue, *see* LCvR 7(h)(1), and any oral argument presented at the hearing on Plaintiff's motion.

Respectfully submitted,

/s/ Douglas N. Letter

Douglas N. Letter (D.C. Bar No. 253492)

General Counsel

Todd B. Tatelman (VA Bar No. 66008)

Deputy General Counsel

Megan Barbero (MA Bar No. 668854)

Associate General Counsel

Josephine Morse (D.C. Bar No. 1531317)

Associate General Counsel

Adam A. Grogg (D.C. Bar No. 1552438)

Assistant General Counsel

Sarah E. Clouse (MA Bar No. 688187)

Attorney

OFFICE OF GENERAL COUNSEL
U.S. HOUSE OF REPRESENTATIVES
219 Cannon House Office Building
Washington, D.C. 20515
Telephone: (202) 225-9700
douglas.letter@mail.house.gov

Annie L. Owens (D.C. Bar No. 976604)

Joshua A. Geltzer (D.C. Bar No. 1018768)

Seth Wayne (D.C. Bar No. 888273455)

INSTITUTE FOR CONSTITUTIONAL
ADVOCACY AND PROTECTION

Georgetown University Law Center

600 New Jersey Avenue NW

Washington, D.C. 20001

Telephone: (202) 662-9042

ao700@georgetown.edu

*Counsel for Plaintiff Committee on the Judiciary of
the U.S. House of Representatives*

August 26, 2019