

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

TRAVIS LEBLANC, *et al.*,

Plaintiffs,

v.

UNITED STATES PRIVACY AND CIVIL
LIBERTIES OVERSIGHT BOARD, *et al.*,

Defendants.

No. 25-cv-542-RBW

PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

Plaintiffs Travis LeBlanc and Edward Felten respectfully move for summary judgment pursuant to Federal Rule of Civil Procedure 56. The grounds for summary judgment are set forth in the plaintiffs' statement of material facts, supporting declarations, and memorandum of law in support of motion for summary judgment, filed contemporaneously and incorporated here by reference.

Consistent with the parties' joint motion for expedited consideration filed today, the plaintiffs respectfully request that the Court decide the parties' cross-motions for summary judgment as soon as its schedule permits to enable the plaintiffs to resume their vital and time-sensitive work as members of the Privacy and Civil Liberties Oversight Board.

WHEREFORE, plaintiffs Travis LeBlanc and Edward Felten respectfully request that the Court grant summary judgment, enter judgment in their favor, and enter the relief specified in the contemporaneously filed proposed order.

Dated: March 12, 2025

Respectfully submitted,

/s/ Elisabeth S. Theodore

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*Application for Admission Pending

CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2025, the foregoing motion for summary judgment was served via ECF to all counsel of record.

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