

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

Ward Brehm,

Plaintiff,

v.

Pete Marocco, et al.,

Defendants.

Civil Case No. 25-cv-660

**PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT AND FOR
PRELIMINARY INJUNCTION**

Plaintiff Ward Brehm, in his individual capacity and his official capacity as President of the United States African Development Foundation (USADF), hereby moves for summary judgment in his favor on all claims in this action pursuant to Rule 56(a) of the Federal Rules of Civil Procedure and Local Rule 7(h), or, in the alternative, for a preliminary injunction under Rule 65 of the Federal Rules of Civil Procedure and Local Rule 65.1.

The grounds for this motion are stated more fully in the accompanying Memorandum in Support of Plaintiff's Motion for Summary Judgment or for Preliminary Injunction, Plaintiff's Statement of Undisputed Material Facts, and the exhibits thereto. A proposed order accompanies this filing.

March 21, 2025

Respectfully submitted,

/s/Joel McElvain
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*motion to appear *pro hac vice* pending

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