

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

JOYCE BEATTY,

Plaintiff,

v.

DONALD J. TRUMP, *et al.*

Defendants.

Civil Action No. 25-4480 (CRC)

**DEFENDANTS' RENEWED MOTION FOR
PARTIAL SUMMARY JUDGMENT**

Pursuant to Rule 56(a) of the Federal Rules of Civil Procedure, Defendants respectfully move for summary judgment on all remaining claims raised in Plaintiff's amended complaint, ECF No. 12. Specifically, Defendants seek summary judgment on Plaintiff's claims regarding the closure of and construction at the John F. Kennedy Memorial Center for the Performing Arts: Count Two, those relevant portions of Count Four, those relevant portions of Count Five, and those relevant portions of Count Seven. A memorandum of law in support, a Declaration of Charles Matthew ("Matt") Floca and exhibits thereto, and a proposed order are filed as attachments to this motion.

Dated: September 18, 2026

Respectfully submitted,

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/s/ William S. Jankowski

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Counsel for Defendants

CERTIFICATE OF SERVICE

I, William S. Jankowski, hereby certify that on September 18, 2026, I electronically filed the foregoing, and all its attachments, using the Court's CM/ECF system, which automatically serves this document upon all counsel of record, in keeping with LCvR 5.4(d).

/s/ William S. Jankowski

William S. Jankowski

Counsel for Defendants