

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

DSCC, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, *et al.*,

Defendants.

Case No. 1:26-cv-01114-CJN

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*,

Plaintiffs,

v.

EXECUTIVE OFFICE OF THE PRESIDENT,
et al.,

Defendants.

Case No. 1:26-cv-01132-CJN

NATIONAL ASSOCIATION FOR THE AD-
VANCEMENT OF COLORED PEOPLE, *et
al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, *et al.*,

Defendants.

Case No. 1:26-cv-01151-CJN

**DEFENDANTS' NOTICE OF FILING OF REVISED MEMORANDUM
OF LAW IN RESPONSE TO THE COURT'S ORDER OF MAY 4, 2026**

On May 4, 2026, the Court issued the following Minute Order:

MINUTE ORDER. Upon review of Federal Defendants' [107] Memorandum in opposition to Plaintiffs' motions for preliminary injunction, it appears that the Memorandum is not double-spaced as required by Paragraph 8(b) of the Court's [48] Standing Order. Accordingly, it is hereby ORDERED that the Federal Defendants refile a memorandum that complies with the Court's Standing Order on or before May 5, 2026. So ORDERED by Judge Carl J. Nichols on 5/4/2026.

Defendants wish to assure the Court that they were not disregarding the Local Rules or this Court's standing order. Nor were Defendants manipulating line spacing to submit a longer brief—indeed, the brief was far below the 70-page limit set by the Court's order of April 24, 2026.

By way of explanation: as is in many jurisdictions, the Local Rules require briefs to be “double-spaced,” Local Rule 5.1(d), but do not define the term “double spaced.” The same is true of Paragraph 8(b) of this Court's standing order, ECF No. 48. Undersigned counsel's typical practice in such jurisdictions is to use line spacing that is exactly “double” the font size. In other words, when using a 12-point font size, “double spaced” would mean “exactly 24-point” line spacing. This practice is supported by judicial authority,¹ and by a leading treatise on legal typography.²

¹ See, e.g., *Jones v. Varsity Brands, LLC*, 2023 WL 11804062, at *2 (W.D. Tenn. Nov. 14, 2023) (“The Local Rules themselves do not take a position on the definition of ‘double spaced.’ Therefore, the Court finds that Plaintiffs' use of twenty-four-point spacing does not violate Local Rule 7.1.”); *Sameer v. Khera*, 2018 WL 3472557, at *1 (E.D. Cal. July 18, 2018) (“This means that the font of documents filed with the Court in this case must be drafted using Times New Roman with a minimum font size of 12-point . . . , and that line spacing of such documents . . . must be double-spaced meaning, at minimum, 24-point line spacing.”).

² See Matthew Butterick, *Typography for Lawyers* (2d ed.), available at <https://typographyforlawyers.com/line-spacing.html> (“Most courts adopted their line-spacing standards in the typewriter era. That's why court rules usually call for double-spaced lines. On a typewriter, each line is the height of the font, thus double spacing means twice the font size. So if you're required to use a 12-point font, double line spacing means 24 points. Curiously, the so-called ‘double’ line-spacing option in your word processor doesn't produce true double line spacing. Microsoft Word's ‘double’ spacing, for instance, is about 15% looser, and it varies depending on the font. To get accurate spacing, you should always set it yourself, exactly.”).

Defendants' interpretation of yesterday's minute order is that the Court's view, however, is that double spacing should conform to the line spacing created by using the automatic "double" line-spacing function in the current version of Microsoft Word. And Defendants, of course, defer entirely to the Court's interpretation of its own standing order. Accordingly, Defendants have now prepared an updated version of their memorandum of law using the "double" spacing setting in Microsoft Word, rather than "exactly 24-point" line spacing. That version is attached to this filing.

The only changes from the version filed on May 1, 2026, ECF Nos. 106-1, 107, are: (1) wider line spacing, (2) updated page numbers for Defendants' "*supra*" and "*infra*" citations, and (3) updated page numbers in the Table of Contents and the Table of Authorities. This version still falls well below the 70-page limit set by the Court's order of April 24, 2026. Defendants have also reattached copies of the Defendants' three declarations of May 1, 2026, for the Court's convenience.

Absent further guidance from the Court, Defendants will ensure that all future filings in these cases use Microsoft Word's "double" spacing feature (as this filing does).

Dated: May 5, 2026

Respectfully submitted,

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