UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

LEAGUE OF WOMEN VOTERS OF MASSACHUSETTS, *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-11549-IT

PLAINTIFFS' EMERGENCY MOTION TO ENFORCE PRELIMINARY INJUNCTION AND FOR EXPEDITED BRIEFING

Plaintiffs League of Women Voters of Massachusetts, League of Women Voters Lotte E. Scharfman Memorial Education Fund, League of Women Voters of the United States, League of Women Voters Education Fund, Association of Americans Resident Overseas, U.S. Vote Foundation, OCA-Asian Pacific American Advocates, and Delta Sigma Theta Sorority, Inc. move to enforce the preliminary injunction, Dkt. No. 183, against Defendants United States Postal Service (USPS), USPS Board of Governors, Amber F. McReynolds (in her official capacity as Chair of the Board of Governors of USPS), Derek T. Kan (in his official capacity as Vice Chairman of the Board of Governors of USPS), Ronald A. Stroman (in his official capacity as a Member of the Board of Governors of USPS), Daniel M. Tangherlini (in his official capacity as a Member of the Board of Governors of USPS), and David P. Steiner (in his official capacity as United States Postmaster General) (collectively, the USPS Defendants). Plaintiffs also respectfully request, pursuant to Local Rule 7.1(b)(2), that the Court require Defendants to file any opposition to this motion by 11:59 p.m. EDT on August 25, 2026, as the Final Rule that violates the injunction is set for publication on August 26. *See* Dkt. No. 188 at 1. Plaintiffs have conferred with USPS

Defendants and Defendant-Intervenors, who oppose both the motion to enforce and the motion to expedite briefing.

On August 11, 2026, this Court entered a preliminary injunction preventing USPS Defendants "from implementing, giving effect to, or enforcing Section 3 of Executive Order No. 14399, with respect to the November 3, 2026 or any earlier federal election, including refusing to transmit mail-in or absentee ballots; or otherwise initiating or completing rulemaking to promulgate the specific regulations outlined in Section 3(b)(i)(v) or (d) of the EO for the November 3, 2026 or any earlier election." Mem. & Order at 27, Dkt. No. 183.

On the evening of August 21, 2026, Defendants sent a Final Rule implementing Section 3 of the Executive Order to the Office of the Federal Register. Dkt. No. 188. The Rule has an immediate effective date of August 21, 2026, so as not to "jeopardize implementation of this rule in time for the 2026 general election." Ex. A at 3. It goes on to note that "[g]iven that mail-in ballots subject to this rule are generally mailed in September or thereafter, an immediate effective date ensures the maximum possible time for election officials to adjust their ballot mail envelopes to meet the new preparation standards if necessary, and to prepare to submit data to the Portal once it becomes active. This promotes states' and political subdivisions' ability to successfully implement the rule prior to the 2026 general election." Ex. A at 72. The Rule contravenes the plain terms of the preliminary injunction.

There are now only 73 days before the November 2026 election, and far fewer before mail ballots begin to go out. Due to the immediate, ongoing, irreparable harm caused by Defendants' violation of the preliminary injunction, and in light of these fast-approaching dates, Plaintiffs respectfully request, pursuant to Local Rule 7.1(b)(2), that the Court order Defendants to file any opposition to this Motion by 11:59 pm ET on Tuesday, August 25, 2026.

As set forth in the accompanying Memorandum in Support of Plaintiffs' Emergency Motion to Enforce Preliminary Injunction, Plaintiffs have demonstrated Defendants' actions are in violation of the preliminary injunction and are entitled to an order enforcing the injunction. A Proposed Order is filed with this Motion.

Dated: August 22, 2026

Respectfully submitted,

/s/ Sophia Lin Lakin

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LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), I certify that counsel for Plaintiffs conferred with counsel for Defendants and Defendant-Intervenors on August 22, 2026, who oppose the motions to enforce and for expedited briefing.

/s/ *Sophia Lin Lakin*
Sophia Lin Lakin

CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2026, a true copy of the above document was filed via the Court's CM/ECF system and that a copy will be sent automatically to all counsel of record.

August 22, 2026

/s/ *Sophia Lin Lakin*
Sophia Lin Lakin