

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

ANNA BOWER, BENJAMIN WITTES, and
AMERICAN CIVIL LIBERTIES UNION,

Plaintiffs,

v.

UNITED STATES SOCIAL SECURITY
ADMINISTRATION, and UNITED STATES
CITIZENSHIP AND IMMIGRATION
SERVICES,

Defendants.

No. 1:25-cv-2713

ORAL ARGUMENT REQUESTED

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65 and Local Rule 65.1(c), Plaintiffs Anna Bower, Benjamin Wittes, and the American Civil Liberties Union (“Plaintiffs”) respectfully move for a preliminary injunction in this Freedom of Information Act (FOIA), 5 U.S.C. § 552, suit against Defendants U.S. Social Security Administration (SSA) and U.S. Citizenship and Immigration Services (USCIS) (“Defendants”). The requested injunction would require Defendants to immediately process Plaintiffs’ FOIA request for records related to updates made to the Systematic Alien Verification for Entitlements (SAVE) database and access being given to sensitive records.

Pursuant to Local Rule 7(m), Plaintiffs’ counsel contacted the Civil Division Chief of the Office of the United States Attorney for the District of Columbia, who indicated that Defendants oppose this motion. Lee Decl. ¶ 15.

Plaintiffs submit the attached Memorandum of Points and Authorities, the Declaration of Theresa J. Lee, and a proposed order.

Dated: August 21, 2025

Respectfully submitted,

/s/ Megan C. Keenan

Megan C. Keenan (D.C. Bar. No. 1672508)

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Attorneys for Plaintiffs

*motion for admission *pro hac vice* forthcoming

CERTIFICATE OF SERVICE

I hereby certify that, on April 7, 2025, I served the foregoing Motion for Preliminary Injunction on the U.S. Attorney for the District of Columbia using the email method of service directed on the U.S. Attorney's Office website, by emailing it to the following address: USADC.ServiceCivil@usdoj.gov.

I also certify that I served the foregoing Motion for Preliminary Injunction on the U.S. Attorney General, U.S. Social Security Administration, and U.S. Citizenship and Immigration Services in this matter by sending it via certified mail to the addresses listed below:

Pamela Bondi, Attorney General of the United States
950 Pennsylvania Avenue, NW
Washington, DC 20530

U.S. Social Security Administration
6401 Security Boulevard
Baltimore, MD 21235

U.S. Citizenship and Immigration Services
5900 Capital Gateway Dr.
Camp Springs, MD 20588

Dated: August 21, 2025

Respectfully submitted,

/s/ Megan C. Keenan
Megan C. Keenan (D.C. Bar. No. 1672508)