

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

American Library Association, et al., <i>Plaintiffs,</i> v. Keith Sonderling, et al., <i>Defendants.</i>	Case No. 1:25-cv-01050
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PLAINTIFFS’ MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure and Local Rule 7(h), Plaintiffs American Library Association and American Federation of State, County, and Municipal Employees, AFL-CIO (collectively, “Plaintiffs”), by and through their attorneys, respectfully move the Court for summary judgment. Plaintiffs request that the Court grant judgment in their favor on their claims that the actions of Keith Sonderling, Institute for Museum and Library Services (IMLS), Donald J. Trump, Amy Gleason, U.S. DOGE Service, U.S. DOGE Service Temporary Organization, Russel Vought, and U.S. Office of Management and Budget (collectively, “Defendants”) to dismantle IMLS are unconstitutional under the Separation of Powers doctrine; unconstitutional under the Take Care Clause of the Constitution; violate the Administrative Procedure Act (APA) because the actions are arbitrary, capricious, an abuse of discretion, unconstitutional, contrary to the Museum and Library Services Act, the 2025 Appropriations Act, and the Paperwork Reduction Act, and in excess of the statutory authority therein; and are ultra vires. Plaintiffs also request that the Court declare as unlawful and vacate each of Defendants’ actions, including the directives to stop work and place staff on administrative leave, the firing of

Board members, the directive to freeze payments, the directive to ignore statutory restrictions on grantmaking; the authorization of grant terminations, and the decision to dismantle the agency.

Dated: September 5, 2025

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