

**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 FOR A TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

Under Federal Rule of Civil Procedure 65, 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. respectfully move for a temporary restraining order and preliminary injunction on an emergency basis on Counts VII, VIII, and IX of their Supplemental Complaint 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 have conferred with USPS Defendants and Defendant-Intervenors, providing the requisite notice required by Federal Rule of Civil Procedure 65 and

satisfying Local Rule 7.1(a)(2). Defendants and Defendant-Intervenors oppose the motion for a temporary restraining order and preliminary injunction.

Specifically, Plaintiffs respectfully ask this Court to enter a temporary restraining order forthwith and preliminarily enjoin the USPS Defendants from implementing or giving effect to Ballot Mail for Federal Elections, 91 Fed. Reg. 54966 (Aug. 26, 2026). As set forth in the accompanying memorandum of law, Plaintiffs are entitled to a temporary restraining order and preliminary injunction because they are likely to succeed on the merits of their claims, they are suffering and will continue to suffer irreparable injuries in the absence of the requested relief as organizations and on behalf of their members, the balance of the equities support an injunction, and the issuance of the injunction is in the public interest.

Plaintiffs request that this Court issue a temporary restraining order immediately and order a briefing schedule that would allow this Court to rule on the motion for a preliminary injunction by Wednesday, September 9, 2026. A proposed order is attached. Defendants and Defendant-Intervenors do not oppose the request for a decision by September 9, and propose the schedule articulated in the Local Rule 7.1 certification below.

REQUEST FOR ORAL ARGUMENT

Under Local Rule 7.1(d), Plaintiffs respectfully request oral argument solely on their Motion for Preliminary Injunction.

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Dated: August 26, 2026

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Respectfully submitted,

/s/ Sophia Lin Lakin

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and Delta Sigma Theta Sorority, Inc.*

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 25 and August 26, 2026, who oppose the motion for temporary restraining order and preliminary injunction.

With respect to Plaintiffs' request for a decision on their preliminary injunction by September 9, 2026, Defendants' position is as follows:

"Defendants defer to the Court on the timing of a decision on Plaintiffs' preliminary-injunction motion and thus do not oppose Plaintiffs' request for a decision by September 9. Defendants propose the following schedule, which would allow for a decision by September 9:

Plaintiffs' TRO and/or PI motions: August 26 at 11:59 PM

Defendants' Opp'ns: Sept. 1 at 2 PM

Plaintiffs' Replies: Sept. 3 at 2 PM"

Defendant-Intervenors join Defendants in their position on the schedule and further request:

"Intervenors respectfully request that any argument not be set on September 2—as their Counsel of Record has an argument conflict that day at the Missouri Supreme Court."

August 26, 2026

/s/ Sophia Lin Lakin
Sophia Lin Lakin

CERTIFICATE OF SERVICE

I hereby certify that on August 26, 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 26, 2026

/s/ Sophia Lin Lakin
Sophia Lin Lakin