

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SHIRA PERLMUTTER,

Plaintiff,

v.

TODD BLANCHE *et al.*,

Defendants.

Case No. 1:25-cv-01659-TJK

MOTION TO ENTER A BRIEFING SCHEDULE

Plaintiff respectfully moves the Court to enter the following expedited briefing schedule for Plaintiff's motion for summary judgment. Although the Court denied Plaintiff's motion for a temporary restraining order, ECF No. 2, on May 28, 2025, based on its view that Plaintiff did not establish irreparable harm, there remains a pressing need for both the parties and the public to obtain a speedy resolution of this matter, as the leadership of the Library of Congress and the Copyright Office will remain in dispute until the legality of Defendants' actions is adjudicated on the merits. It would best serve judicial economy and the interests of the parties to proceed to final judgment. If, however, expedited summary judgment is unavailable, then Plaintiff would request an opportunity to confer further with Defendants to determine a schedule for briefing a preliminary injunction.

Plaintiff therefore respectfully requests that the Court enter the following briefing schedule:

- **Plaintiff's motion for summary judgment: June 5, 2025;**
- **Defendants' opposition to Plaintiff's motion for summary judgment: June 12, 2025; and**

- **Plaintiff's reply in support of her motion for summary judgment: June 16, 2025.**

Plaintiff has conferred with Defendants who have stated their position as follows:

“Defendants do not agree that now is the appropriate time to agree to a summary judgment schedule.” Defendants have also stated that they intend to file an opposition to this motion.

Dated: May 29, 2025

Respectfully,

/s/ Allyson R. Scher

Brian D. Netter (D.C. Bar No. 979362)

Allyson R. Scher (D.C. Bar No. 1616379)

Democracy Forward Foundation

P.O. Box 34553

Washington, DC 20043

(202) 448-9090

bnetter@democracyforward.org

ascher@democracyforward.org

Donald B. Verrilli, Jr. (D.C. Bar. No. 420434)

Ginger D. Anders (D.C. Bar No. 494471)

MUNGER, TOLLES & OLSON LLP

601 Massachusetts Avenue, NW, Suite 500E

Washington, D.C. 20001

(202) 220-1100

donald.verrilli@mto.com

ginger.anders@mto.com

Kuruvilla J. Olasa (admitted pro hac vice)

James R. Salzmann (admitted pro hac vice)

Miranda E. Rehaut (admitted pro hac vice)

Adeel Mohammadi (admitted pro hac vice)

MUNGER, TOLLES & OLSON LLP

350 South Grand Avenue, 50th Floor

Los Angeles, California 90071

(213) 683-9100

kuruvilla.olasa@mto.com

james.salzmann@mto.com

miranda.rehaut@mto.com

adeel.mohammadi@mto.com

Counsel for Plaintiff