

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION**

ASYLUM SEEKER ADVOCACY PROJECT,

Plaintiff,

v.

EXECUTIVE OFFICE FOR IMMIGRATION  
REVIEW, *et al.*,

Defendants.

Civil Action No. 1:25-cv-03299-SAG

**Hearing Requested**

**Plaintiff's Motion for Summary Judgment and  
Opposition to Defendants' Motion to Dismiss (ECF 99)**

Plaintiff Asylum Seeker Advocacy Project respectfully moves, pursuant to Federal Rule of Civil Procedure 56, for summary judgment on Counts 1 through 3 and Count 5 of the Amended Complaint, and in the alternative on Count 4. ASAP opposes Defendants' Motion to Dismiss (ECF 99). For the reasons set forth in the accompanying memorandum, Plaintiff respectfully requests that the Court grant summary judgment to Plaintiff, deny Defendants' Motion to Dismiss, and enter the relief described in the accompanying proposed order.

DATED: June 8, 2026

Respectfully submitted,

/s/ Andrew G. Barron

Matt Gregory\*

Susan M. Pelletier\*

Eric Brooks\*

Andrew G. Barron (D. Md. Bar 30311)

Rachel E. Schwab (D. Md. Bar 31646)

GIBSON, DUNN & CRUTCHER, LLP

1700 M Street, N.W.

Washington, D.C. 20036

Telephone: (202) 955-8500

Facsimile: (202) 831-6088

mgregory@gibsondunn.com

spelletier@gibsondunn.com

ebrooks2@gibsondunn.com

abarron@gibsondunn.com

rschwab@gibsondunn.com

Conchita Cruz\*

Jessica Hanson (D. Md. Bar 31903)

Leidy Perez\*

Marcela X. Johnson\*

Juan E. Bedoya\*

ASYLUM SEEKER ADVOCACY PROJECT

228 Park Ave. S. #84810

New York, NY 10003-1502

Telephone: (646) 647-6779

conchita.cruz@asaptogether.org

jess.hanson@asaptogether.org

leidy.perez@asaptogether.org

marcela.johnson@asaptogether.org

juan.bedoya@asaptogether.org

*Counsel for Plaintiff*

\*Admitted *pro hac vice*