

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

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as President of the United States, *et al.*,

Defendants.

Case No. 8:19-cv-02710-PX-PAH-ELH

PLAINTIFFS' NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiffs La Unión Del Pueblo Entero, *et al.*, (“Plaintiffs”), by and through their undersigned counsel, hereby give notice that this action is dismissed by Plaintiffs without prejudice and in its entirety.

On August 13, 2020, Plaintiffs filed their Second Amended Complaint. Defendants have neither filed an answer nor moved for summary judgment. Fed. R. Civ. P. 41 (a)(1)(A)(i) provides that under these circumstances, a plaintiff may voluntarily dismiss his or her case without

leave of court. A voluntary dismissal under this subsection is without prejudice, unless the notice states otherwise. Fed. R. Civ. P. 41 (a)(1)(B).

In light of recent developments and actions by Defendants, including:

1. President Joseph R. Biden's issuance of his January 20, 2021 Executive Order on Ensuring a Lawful and Accurate Enumeration and Apportionment Pursuant to the Decennial Census which, *inter alia*, revokes the previous administration's Executive Order on Collecting Information About Citizenship Status in Connection with the Decennial Census (EO 13880), and revokes the previous administration's July 21, 2020 Presidential Memorandum Excluding Illegal Aliens From the Apportionment Base Following the 2020 Census;¹
2. The Census Bureau's termination of its effort to produce a block level Post-2020 Census CVAP Special Tabulation;² and
3. Defendants' representations that they will take appropriate measures during post data collection processing to ensure Census data quality,³

Plaintiffs have concluded that their claims in the case are resolved. Plaintiffs thus give notice of voluntary dismissal without prejudice.

Dated: March 31, 2021

Respectfully submitted,
By /s/ Terry Ao Minnis

¹ Exec. Order No. 13,986, 86 Fed. Reg. 7015 (Jan. 20, 2021), <https://www.federalregister.gov/documents/2021/01/25/2021-01755/ensuring-a-lawful-and-accurate-enumeration-and-apportionment-pursuant-to-the-decennial-census>.

² See, Letter from Pamela S. Karlan, Principal Deputy Assistant Attorney General, Dr. Ron Jarmin, Acting Director, U.S. Census Bureau (Feb. 16, 2021), <https://www.documentcloud.org/documents/20489337-feb-16-2021-letter-from-the-justice-department-to-the-census-bureau>; see also, *Citizen Voting Age Population by Race and Ethnicity*, U.S. CENSUS BUREAU (Feb. 19, 2021), <https://www.census.gov/programs-surveys/decennial-census/about/voting-rights/cvap.html>; Press Release, U.S. CENSUS BUREAU, Statement on American Community Survey Data (Feb. 19, 2021), <https://www.census.gov/newsroom/press-releases/2021/statement-american-community-survey.html>.

³ See e.g., *Important Dates*, U.S. CENSUS BUREAU, <https://2020census.gov/en/important-dates.html> (last visited March 22, 2021); see also, Michael Thieme, *Finding 'Anomalies' Illustrates 2020 Census Quality Checks Are Working*, U.S. CENSUS BUREAU (Mar. 9, 2021), https://www.census.gov/newsroom/blogs/random-samplings/2021/03/finding_anomalies.html.

**ASIAN AMERICANS ADVANCING
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** Pro hac vice application forthcoming*

^o Not admitted in D.C.

CERTIFICATE OF SERVICE

I certify that on this 31st day of March, 2021, I caused a copy of the Plaintiffs' Notice of Voluntary Dismissal Without Prejudice to be sent to all parties receiving CM/ECF notices in this case.

/s/ Terry Ao Minnis

Terry Ao Minnis