

**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

DEFENDANTS' STATEMENT OF MATERIAL FACTS NOT IN DISPUTE

1	Plaintiff Shira Perlmutter was appointed to serve as the Register of Copyrights in October 2020 by then-Librarian of Congress, Carla D. Hayden. ECF No. 49-3 ¶ 1.	
2	President Trump removed Carla D. Hayden from her position as Librarian of Congress on May 8, 2025. ECF No. 49-3 ¶ 5.	
3	On May 9, 2025, the President issued a memorandum directing the Deputy Attorney General, Todd Blanche, "to perform the duties of the office of the Librarian of Congress." ECF No. 49-5 at 2.	
4	On May 10, 2025, Trent Morse, the Deputy Assistant to the President and Deputy Director of the White House Presidential Personnel Office, sent an email to Plaintiff stating that her "position as the Register of Copyrights and Director of the U.S. Copyright Office is terminated effective immediately." ECF No. 49-4.	
5	On May 11, 2025, Mr. Blanche designated Paul Perkins as the acting Register of Copyrights and Director of the U.S. Copyright Office. ECF No. 49-5 at 1.	
6	On May 11, 2025, Mr. Blanche designated Brian Nieves as the Acting Principal Deputy Librarian of the Library of Congress. ECF No. 49-5 at 1.	

Dated: September 22, 2025

Respectfully submitted,

BRETT A. SHUMATE
Assistant Attorney General

YAAKOV M. ROTH
Principal Deputy Assistant Attorney General

ERIC J. HAMILTON
Deputy Assistant Attorney General

CHRISTOPHER R. HALL
Assistant Branch Director
Federal Programs Branch

/s/ Benjamin Hayes
BENJAMIN HAYES
Senior Counsel to the Assistant Attorney General,
Civil Division
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530
(202) 514-8214
Benjamin.T.Hayes@usdoj.gov

Counsel for Defendants