

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

**AMERICAN ASSOCIATION OF
NURSE PRACTITIONERS, et al.,**

Plaintiffs,

v.

LINDA MCMAHON, et al.,

Defendants.

Case No. 26-cv-01780-BAH

**consolidated with
Case No. 26-cv-01941-BAH**

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PA Education Association and
American Academy of Physician Associates***

**MOTION FOR SUMMARY JUDGMENT OF PLAINTIFFS PA EDUCATION
ASSOCIATION AND AMERICAN ACADEMY OF PHYSICIAN ASSOCIATES**

Plaintiffs respectfully move this the Court for summary judgment under Federal Rule of Civil Procedure 56 and ask the Court to hold unlawful and set aside the Final Rule’s regulatory definition of “professional degree” and separate free-from-supervision requirement under 5 U.S.C. § 706(2)(A) and (C), and remand the matter to the Department for further proceedings consistent with the Higher Education Act, 20 U.S.C. § 1087e(a)(4)(C)(ii), the APA, 5 U.S.C. §§ 701-706, and this Court’s opinion.

A Memorandum in Support accompanies this Motion, along with a Proposed Order.

Respectfully submitted,

Date: October 1, 2026

/s/Paul D. Cullen, Jr.

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