

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

KILMAR ARMANDO ABREGO
GARCIA et al.,

Plaintiffs,

v.

KRISTI NOEM, Secretary of Homeland
Security, et al.,

Defendants.

Civil No.: 8:25-cv-00951-PX

**DEFENDANTS' MOTION FOR A
STAY PENDING APPEAL**

MOTION FOR A STAY OF PRELIMINARY INJUNCTION ORDER

Pursuant to Federal Rule of Civil Procedure 62, Defendants hereby request that the Court promptly issue a stay pending appeal of the Court's Order granting Plaintiffs' Motion for Injunctive Relief, ECF No. 21. For the reasons set forth in Defendants' stay motion filed with the Fourth Circuit earlier this evening, Defendants submit that a stay of the Court's amended preliminary injunction order and expedited discovery order is warranted. *See Abrego Garcia v. Noem*, 25-1404, (filed Apr. 16, 2025), attached as Exhibit A. For the same reasons, it would be appropriate for the Court to reconsider its order. Given the urgency of harms to the government, Defendants request an immediate administrative stay of the orders. Counsel has communicated the intended filing of this motion Plaintiffs' counsel, who do not consent to the motion.

Respectfully Submitted,

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/s/ Drew Ensign

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