

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

American Federation of Teachers, *et al.*,

Plaintiffs,

v.

U.S. Department of Education, *et al.*,

Defendants.

Civil Case No. 1:25-cv-00628

PLAINTIFFS' MOTION FOR MISCELLANEOUS RELIEF

Plaintiffs respectfully request that this Court set a status conference to address two issues currently pending in this matter. Plaintiffs have contacted Defendants' counsel seeking their position on this motion but have not yet received a response. If the Court determines that the pending issues can be addressed without a status conference, Plaintiffs respectfully request that the Court enter the requested relief on the docket. In support of this motion, Plaintiffs state:

1. Plaintiffs filed this Complaint on February 25, 2025. Dkt. 1. On March 5, 2025, Plaintiffs sought leave to file an enlarged amended complaint, and a proposed order granting the motion. Dkts. 13, 13-1, 14. That motion remains pending.
2. That same day, the Court ordered Plaintiffs to "SHOW CAUSE as to why this lawsuit should be heard in Maryland" and set a March 12, 2025, deadline for doing so. Dkt. 16.
3. In accordance with the schedule the Court set forth, Plaintiffs filed their response to the Order to Show Cause on March 12, 2025. Dkt. 18. In their response, Plaintiffs noted that they anticipated filing a motion for a preliminary injunction this week. *Id.* at 5.

4. Defendants filed an unsolicited response on the Order to Show Cause on March 13, 2025. While Plaintiffs do not agree with the Defendants' legal conclusions regarding AFT-Maryland's capacity to file suit, they refrained from submitting further briefing on the narrow issue the Court asked Plaintiffs to address.
5. Plaintiffs anticipate filing a motion for a preliminary injunction within days, but in the interests of judicial efficiency, seek the Court's guidance on whether the enlarged amended complaint (Dkt. 14, 14-1) is the operative version, and whether this Court will retain venue so that Plaintiffs may take appropriate next steps with regard to filing their motion for preliminary injunction.
6. Plaintiffs seek a status conference at the Court's next availability, on or before March 21, 2025, or, if the Court deems appropriate, request that the Court resolve the two pending issues even absent a status conference.

A proposed Order accompanies this Motion.

Respectfully submitted,

Dated: March 19, 2025

/s/ Victoria S. Nugent

Victoria S. Nugent
Madeline H. Gitomer +
Brooke Menschel
Rachel F. Homer**+
Andrew Bookbinder**
Kali Schellenberg**
Democracy Forward Foundation
P.O. Box 34553
Washington, DC 20043
(202) 448-9090
vnugent@democracyforward.org
mgitomer@democracyforward.org
bmenschel@democracyforward.org
rhomer@democracyforward.org
abookbinder@democracyforward.org
kschellenberg@democracyforward.org

Counsel for Plaintiffs

+ Application for full admission pending

** Admitted *Pro hac vice*

**Pro hac vice* application forthcoming

CERTIFICATE OF SERVICE

I hereby certify that on March 19, 2025, I electronically filed this document with the Court by using the CM/ECF system, and that this document was distributed via the Court's CM/ECF system.

/s/ Victoria S. Nugent
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Democracy Forward Foundation
P.O. Box 34553
Washington, DC 20043
(202) 448-9090
vnugent@democracyforward.org