

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

STATE OF MARYLAND, et al.,

Plaintiffs,

v.

UNITED STATES DEP'T OF
AGRICULTURE et al.,

Defendants.

Case No. 1:25-cv-00748-JKB

**DEFENDANTS' MOTION TO STAY
PRELIMINARY INJUNCTION PENDING APPEAL**

Pursuant to Federal Rule of Civil Procedure 62(d), Defendants respectfully move for a stay of the Court's April 1, 2025 Preliminary Injunction Order (ECF 126), pending Defendants' appeal of that Order. The reasons for this motion are set forth in the accompanying memorandum.

Defendants respectfully request a ruling by 2 p.m. E.T., Friday, April 4, 2025. Thereafter, if relief has not been granted, Defendants respectfully intend to seek relief from the U.S. Court of Appeals for the Fourth Circuit.

Dated: April 3, 2025

Respectfully submitted,

YAAKOV ROTH
Acting Assistant Attorney General
Civil Division

ERIC J. HAMILTON
Deputy Assistant Attorney General

DIANE KELLEHER
Director

CHRISTOPHER HALL
Assistant Director

/s/ Steven M. Chasin

Steven M. Chasin
Trial Attorney
U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, N.W.
Washington, D.C. 20005
Tel.: (202) 305-0747
Email: Steven.M.Chasin2@usdoj.gov

KELLY O. HAYES
United States Attorney

Beatrice C. Thomas
Assistant United States Attorney
United States Attorney's Office
36 S. Charles Street, 4th Floor
Baltimore, MD 21202
Email: beatrice.thomas@usdoj.gov

Attorneys for Defendants