

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

COALITION FOR HUMANE IMMIGRANT RIGHTS,
et al.,

Plaintiffs,

v.

KRISTI NOEM, in her official capacity as Secretary of
Homeland Security, *et al.*,

Defendants.

Case No.: 1:25-cv-0872

MOTION FOR A STAY OF AGENCY ACTION UNDER 5 U.S.C. § 705

Plaintiffs Coalition for Humane Immigrant Rights (“CHIRLA”), CASA, Inc. (“CASA”), and UndocuBlack Network (“UndocuBlack”) respectfully move under 5 U.S.C. § 705 of the Administrative Procedure Act (“APA”) to stay the effective date of agency actions. Plaintiffs seek an order immediately postponing and staying the effective dates of implementation and enforcement of the January 23 Huffman Memorandum, February 18 ICE Directive, and March 25 Parole Termination Notice for Cubans, Haitians, Nicaraguans, and Venezuelans (CHNV) insofar as they subject individuals who have previously been granted parole at ports of entry to expedited removal. Defendants oppose this motion.

Plaintiffs file this motion to stop the irreparable harm that their members, their members’ families and communities, and the public are suffering due to the agency actions. In recent weeks, Defendants have aggressively targeted for expedited removal individuals who entered the country lawfully after being inspected and paroled at official ports of entry, including by moving to dismiss their ongoing removal proceedings in immigration courts across the country. Paroled individuals

showing up to routine court appearances are being unexpectedly arrested and detained once their proceedings have been dismissed—and occasionally when proceedings have not been dismissed—and are then placed in a rapid, summary deportation process (or threatened with such placement) despite the fact that they have been dutifully appearing for court hearings and, in many cases, timely filed applications for asylum or other immigration relief. Plaintiffs’ members already have been subjected to serious harm by Defendants’ actions, and other members of the Plaintiff organizations who were paroled into the country at ports of entry are at imminent risk of being similarly subjected to expedited removal in violation of the law. Defendants’ actions, pursuant to the January 23 Huffman Memorandum, February 18 ICE Directive, and March 25 CHNV Parole Termination Notice, are unlawful and place Plaintiffs’ members at risk of deportation without due process, loss of immigration relief for which they are eligible, and separation from their families and lives in the United States.

This Motion is based upon this Motion; the accompanying Memorandum of Law; the supporting declarations and evidence filed concurrently herewith; the pleadings and filings in this case; any additional matter of which the Court may take judicial notice; and such further evidence or argument as may be presented before, at, or after a hearing on this Motion.

A proposed order is attached hereto.

REQUEST FOR ORAL ARGUMENT

Plaintiffs respectfully request an oral argument pursuant to Local Rule 7(f) on this Motion.

Dated: June 11, 2025

Respectfully submitted,

/s/ Esther H. Sung

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CERTIFICATE OF SERVICE

I hereby certify on June 11, 2025, I caused a copy of the foregoing to be transmitted to all Defendants through the CM/ECF filing system.

/s/ Esther H. Sung
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