

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

CASA, INC.,

*Plaintiff,*

v.

KRISTI NOEM, Secretary of Homeland  
Security, in her official capacity, & U.S.  
DEPARTMENT OF HOMELAND  
SECURITY

*Defendants.*

**Case No.:** 8:25-cv-1484

**PLAINTIFF CASA, INC.'S MOTION FOR A STAY OF AGENCY ACTION  
OR PARTIAL SUMMARY JUDGMENT**

Plaintiff CASA, Inc., by and through its undersigned counsel, respectfully move for:

1. An order postponing the effective dates of Defendants purported terminations of the Temporary Protected Status (TPS) designations for Afghanistan and Cameroon, pursuant to 5 U.S.C. § 705 of the Administrative Procedure Act (APA); or
2. Summary judgment as to Counts I and II of the Complaint, declaring unlawful and setting aside the purported TPS designations for Afghanistan and Cameroon; and declaring that the TPS designation is extended until at least November 20, 2025, and the TPS designation is extended until at least December 7, 2025, pursuant to 5 U.S.C. § 706 of the APA and Federal Rule of Civil Procedure 56.

In support of this motion, Plaintiffs submit the attached memorandum of law and accompanying exhibits.

May 7, 2025

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Respectfully submitted,

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*\*Motion for admission pro hac vice forthcoming.*

*<sup>†</sup>Motion for admission pro hac vice forthcoming. DC Bar application pending, practice pursuant to Rule 49(c)(8), DC Courts, and supervised by DC Bar member.*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 7, 2025, a copy of the foregoing document was mailed via certified mail, postage prepaid, to Defendants and their counsel at the following addresses:

United States Civil Process Clerk  
United States Attorney's Office for the District of Maryland  
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Greenbelt, MD 20770

Secretary Kristi Noem & Department of Homeland Security  
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/s Jonathan L. Backer  
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