

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

STATE OF MARYLAND; STATE OF
DELAWARE; STATE OF CALIFORNIA; STATE
OF COLORADO; STATE OF ARIZONA; STATE
OF CONNECTICUT; DISTRICT OF COLUMBIA,
STATE OF HAWAI‘I; STATE OF ILLINOIS;
OFFICE OF THE GOVERNOR *ex rel.* Andy
Beshear, in his official capacity as Governor of the
COMMONWEALTH OF KENTUCKY; STATE OF
MAINE; COMMONWEALTH OF
MASSACHUSETTS; PEOPLE OF THE STATE OF
MICHIGAN; STATE OF MINNESOTA; STATE OF
NEVADA; STATE OF NEW JERSEY; STATE OF
NEW MEXICO; STATE OF NEW YORK; STATE
OF NORTH CAROLINA; STATE OF OREGON;
JOSH SHAPIRO, in his official capacity as
Governor of the COMMONWEALTH OF
PENNSYLVANIA; STATE OF RHODE ISLAND;
STATE OF VERMONT; STATE OF
WASHINGTON; STATE OF WISCONSIN;

Plaintiffs,

v.

CORPORATION FOR NATIONAL AND
COMMUNITY SERVICE, operating as
AmeriCorps; and JENNIFER BASTRESS
TAHMASEBI, in her official capacity as Interim
Head of the Corporation for National and
Community Service;

Defendants.

Civ. No. 25-cv-01363 (DLB)

**PLAINTIFF STATES’ MOTION FOR A
5 U.S.C. § 705 STAY AND PRELIMINARY INJUNCTION**

For reasons explained in greater detail in the accompanying memorandum of law, Plaintiff States move for an order entering a stay under section 705 of the Administrative Procedure Act (APA), 5 U.S.C. § 705, and a preliminary injunction against all Defendants,

1. Vacating Defendants' acts, omissions, or both, directing, providing for, intended to accomplish, or effectuating the dismantling of AmeriCorps, specifically:
 - a. Vacating, with respect to all NCCC members assigned to placements in Plaintiff States, Defendants' acts undertaken on or around April 15, 2025, to release all NCCC members from the AmeriCorps program effective April 30, 2025;
 - b. Vacating, throughout the United States, Defendants' acts undertaken on or around April 15, 2025, to place approximately 85% of AmeriCorps staff on administrative leave;
 - c. Vacating, throughout the United States, Defendants' acts undertaken on or around April 24, 2025, to institute a reduction in force for AmeriCorps staff;
 - d. Vacating, with respect to programs located in Plaintiff States, Defendants' acts undertaken on or around April 25, 2025, to terminate approximately 1,031 AmeriCorps programs and associated funding;
2. Enjoining, pending further order of the Court, Defendants, their agents, and anyone acting at Defendants' direction, from reissuing, adopting, implementing, giving effect to, or reinstating under a different name or means any of the foregoing acts; and
3. Requiring Defendants to file, within one week of entry of this order, a Status Report documenting the actions that they have taken to comply with the Court's order.

Dated: May 6, 2025

Respectfully submitted,

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** Motion for admission pro hac vice forthcoming*

CERTIFICATE OF SERVICE

I certify that on May 6, 2025, I electronically filed the foregoing document and its attachments via CM/ECF and thereby served all parties who have appeared through counsel on the Court's electronic docket.

For Plaintiff States whose counsel's motions for admission pro hac vice are forthcoming, I served the foregoing document and its attachments via email to those counsel.

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