

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

*D.N.N. and V.R.G, on behalf of themselves and
all others similarly situated,*

Petitioners-Plaintiffs,

v.

NIKITA BAKER, et al.,

Respondents-Defendants.

Case No. 1:25-cv-01613

PETITIONERS-PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Petitioners-Plaintiffs D.N.N. and V.R.G. ("Plaintiffs") on behalf of themselves and all others similarly situated, by and through their undersigned counsel, move pursuant to Fed. R. Civ. P. 65 for a preliminary injunction against Defendants in the above-captioned action.

For the reasons set forth in the accompanying Memorandum of Law in Support, which is incorporated by reference, Plaintiffs can establish the four factors required when seeking a preliminary injunction: (1) they are likely to succeed on the merits; (2) they are likely to suffer irreparable harm in the absence of preliminary relief; (3) the balance of equities tips in their favor; and (4) an injunction is in the public interest.

Plaintiffs respectfully request this Court GRANT Plaintiffs' Motion for Preliminary Injunction and issue an order enjoining Defendants and their agents and employees from: (i) operating the hold rooms at the Immigration and Customs Enforcement Baltimore Field Office (the "Baltimore Hold Rooms") as a residential (*i.e.* overnight or multi-day) facility and (ii) subjecting Plaintiffs and Class Members to punitive and unconstitutional conditions of confinement in the Baltimore Hold Rooms.

Dated: June 12, 2025

Respectfully Submitted,

/s/ Jerome A. Murphy

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Pro bono counsel for Plaintiffs

*Admitted *pro hac vice*

** *Pro Hac Vice* forthcoming