

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CITY OF CHELSEA and
CITY OF SOMERVILLE,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United States, PAMELA J. BONDI, Attorney General of the United States, UNITED STATES DEPARTMENT OF JUSTICE, KRISTI L. NOEM, Secretary of the United States Department of Homeland Security, UNITED STATES DEPARTMENT OF HOMELAND SECURITY, SEAN P. DUFFY, Secretary of the United States Department of Transportation, UNITED STATES DEPARTMENT OF TRANSPORTATION, SCOTT TURNER, Secretary of the United States Department of Housing and Urban Development, UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT, and UNITED STATES OF AMERICA,

Defendants.

Case No. 1:25-cv-10442

**PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

ORAL ARGUMENT REQUESTED

Pursuant to Fed. R. Civ. P. 65(a) and Local Rule 7.1, Plaintiffs City of Chelsea and City of Somerville hereby move this Court to preliminarily enjoin Defendants from implementing or enforcing the unlawful Executive Orders and Agency Directives listed in the Proposed Order attached to this Motion. The grounds for this motion are set forth in the accompanying Memorandum of Law.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), Plaintiffs request oral argument given the complex constitutional, statutory, and factual issues involved in their Motion.

Dated: June 3, 2025

Respectfully submitted,

/s/ Oren Sellstrom

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Oren Sellstrom (BBO# 569045)

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*Attorneys for Plaintiffs City of Chelsea and
City of Somerville*

LOCAL RULE 7.1 CERTIFICATE

I certify that on May 28, 2025, I emailed attorneys Rayford Farquhar, Chief of Defensive Litigation of the Civil Division at the United States Attorney's Office for the District of Massachusetts, as well as Abraham George, Chief of Affirmative Civil Enforcement at the United States Attorney's Office for the District of Massachusetts, to advise them of Plaintiffs' intention to file this Motion and for leave to file excess pages. As counsel for Defendants had not yet formally appeared in this action, I stated that if the attorney assigned to this matter would like to discuss, I could be reached at the contact information I provided. Attorney Farquhar emailed back to advise that Defendants did not object to the request for excess pages, but did not otherwise address the substance of the Motion. Plaintiffs are proceeding with this filing, given the pressing need for relief, as set forth in the accompanying Memorandum of Law.

/s/ Oren Sellstrom
Oren Sellstrom

CERTIFICATE OF SERVICE

I, Oren Sellstrom, hereby certify that on this 3rd day of June, 2025, I caused the foregoing document and all attachments thereto to be served via U.S. priority mail, addressed as follows:

UNITED STATES OF AMERICA
c/o United States Attorney for the District of Massachusetts
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 9200, Boston, MA 02210

DONALD J. TRUMP, in his official capacity as President of the United States
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

PAMELA J. BONDI, in her official capacity as Attorney General of the United States
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

UNITED STATES DEPARTMENT OF JUSTICE
United States Department of Justice
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KRISTI L. NOEM, in her official capacity as Secretary of the United States Department of Homeland Security
United States Department of Homeland Security
245 Murray Lane, SW
Washington, DC 20528-0485

UNITED STATES DEPARTMENT OF HOMELAND SECURITY
Office of General Counsel
245 Murray Lane SW, Mail Stop 0485
Washington, DC 20528-0485

SEAN P. DUFFY in his official capacity as Secretary of the United States Department of Transportation
United States Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

UNITED STATES DEPARTMENT OF TRANSPORTATION
United States Department of Transportation
1200 New Jersey Ave, SE
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SCOTT TURNER in his official capacity as Secretary of the United States Department of Housing and Urban Development
United States Department of Housing and Urban Development
451 7th Street S.W.,
Washington, DC 20410

UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
United States Department of Housing and Urban Development
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I also sent a copy of the foregoing document and all attachments thereto via electronic mail as follows:

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/s/ Oren Sellstrom
Oren Sellstrom