

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AFRICAN COMMUNITIES TOGETHER; and THE
DOOR,

Plaintiffs,

v.

Todd M. LYONS, in his official capacity as Acting
Director, U.S. Immigration and Customs
Enforcement; Kristi NOEM, in her official capacity as
Secretary of the U.S. Department of Homeland
Security; Sirce E. OWEN, in her official capacity as
Acting Director, Executive Office of Immigration
Review; and Pamela BONDI, in her official capacity as
Attorney General, U.S. Department of Justice,

Defendants.

Case No. 25-cv-06366

ORAL ARGUMENT
REQUESTED

**NOTICE OF PLAINTIFFS' MOTION TO STAY
EFFECTIVE DATE OF AGENCY ACTION OR PRESERVE STATUS OR RIGHTS**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Plaintiffs' Motion to Stay Effective Date of Agency Action or Preserve Status or Rights, dated August 11, 2025, and all supporting materials, Plaintiffs African Communities Together and The Door ("Plaintiffs") move this Court, before the Honorable P. Kevin Castel of the United States District Court of the Southern District of New York, 500 Pearl Street, New York, New York, for an Order granting Plaintiffs' motion to stay or postpone, pursuant to the Administrative Procedure Act, 5 U.S.C. § 705, the U.S. Immigration and Customs Enforcement's policy abandoning its prior restrictions on immigration courthouse arrests and the Executive Office of Immigration Review's policy encouraging immigration judges to dismiss noncitizens' removal proceedings without any meaningful process, pending adjudication of this matter.

Pursuant to ECF 21, any opposition to this motion is due on or before August 20, 2025, and any reply is due on or before August 25, 2025.

Dated: August 11, 2025
New York, New York

Respectfully submitted,

NEW YORK CIVIL LIBERTIES UNION
FOUNDATION

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* Admission pending
**Pro hac vice application forthcoming

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