UNITED STATES DISTRICT COURT DISTRICT OF COLUMBIA

MARIA MOE,

Plaintiff,

v.

Case No.: 1:25-cv-00653-RCL

DONALD TRUMP, in his official capacity as President of the United States, et al.,

Defendants.

## UNOPPOSED MOTION FOR RENEWED PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65 and Local Civil Rule 65.1, Plaintiff Maria Moe respectfully files this unopposed motion for entry of a new preliminary injunction as to all Defendants.

Plaintiff relies on the concurrently filed memorandum of points and authorities, the Complaint, the declarations filed in support thereof, and other documents filed in this action to support the requested relief. Pursuant to Local Civil Rule 7(m), undersigned counsel states that they have met and conferred with opposing counsel regarding this motion. Defendants have represented that they will not oppose this motion. ECF No. 72 at 2 n.1.

Because of Defendants' non-opposition and because the legal and factual issues are substantially similar to Plaintiff's prior motions, Plaintiff does not believe a hearing is necessary but respectfully requests that the Court schedule an expedited hearing on this motion if the Court desires one.

Pursuant to Local Rule 65.1(c), copies of this motion and all pleadings and papers filed in this action shall be furnished to opposing counsel at the time of filing through the Court's electronic filing system.

Dated: May 16, 2025

## /s/ Alexander Shalom

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