

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
SOUTHERN DIVISION

CASA, INC. and MAKE THE ROAD NEW
YORK

Plaintiffs,

v.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security and UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY

Defendants.

Case No. 8:25-cv-00525-GLR

ORAL ARGUMENT REQUESTED

**PLAINTIFFS CASA, INC. AND MAKE THE ROAD NEW YORK'S
MOTION FOR PARTIAL SUMMARY JUDGMENT**

Plaintiffs CASA, Inc. and Make the Road New York ("Plaintiffs"), by their undersigned attorneys, pursuant to Federal Rule of Civil Procedure 56, respectfully move for:

(1) Summary judgment as to Count I of the Complaint, ECF No. 1, declaring Secretary Noem's January 28, 2025 vacatur of the January 17, 2025 decision extending TPS for Venezuela unlawful and of no effect; and

(2) Summary judgment as to Count II of the Complaint, ECF No. 1, declaring Secretary Noem's February 5, 2025 termination of the TPS designation for Venezuela unlawful and of no effect.

In support of the foregoing motions, Plaintiff relies on the Memorandum of Law submitted herewith, including the statement of undisputed material facts contained therein, and the accompanying exhibits and affidavits.

Dated: March 3, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Nowell D. Bamberger, certify that I have served Plaintiffs' Motion for Partial Summary Judgment, the memorandum in support of the Motion, and all exhibits and declarations filed in support thereof, via the Court's ECF filing system, which will cause a copy of these documents to be delivered to all counsel of record.

SO CERTIFIED, this 3rd day of March 2025.

/s/ Nowell D. Bamberger
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