

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

**NOTICE OF CROSS-MOTION FOR A STAY OF AGENCY ACTION**

PLEASE TAKE NOTICE that, in response to Defendants’ Motion to Stay Partial Summary Judgment Briefing (ECF No. 27) (“Stay Motion”), Plaintiffs CASA, Inc. and Make the Road New York will and hereby do cross-move for an order pursuant to 5 U.S.C. § 705 staying the effective date of the following agency actions pending judicial review by this Court:

- Defendants’ decision of February 3, 2025 at 90 Fed. Reg. 8805, purporting to “vacate” the extension of Temporary Protected Status (“TPS”) for Venezuela issued on January 17, 2025; and
- Defendants’ order of February 5, 2025 at 90 Fed. Reg. 9040, purporting to issue a new decision terminating the 2023 TPS designation for Venezuela.

To prevent irreparable harm, and in the event that the Court does not grant Plaintiffs’ Motion for Partial Summary Judgment (ECF No. 8) prior to that date, Plaintiffs respectfully ask this Court to act on this cross-motion on or before April 7, 2025, the date on which Defendants’ unlawful acts are set to take effect.

This Cross-Motion is based upon this Notice of Cross-Motion; the accompanying Memorandum in Opposition to Defendants' Motion to Stay Partial Summary Judgment Briefing and in Support of Plaintiffs' Cross-Motion for a Stay of Agency Action; the Declarations of Nowell D. Bamberger (ECF No. 8-2), George Escobar (ECF No. 8-9) and Sienna Fontaine (ECF No. 8-10); the pleadings and filings in this case; any additional matter of which the Court may take judicial notice; and such further evidence or argument as may be presented before, at, or after related hearings.

Date: March 10, 2025

Respectfully submitted,

CLEARY GOTTlieb STEEN & HAMILTON LLP

By: /s/ Nowell D. Bamberger  
Nowell D. Bamberger (21111)  
Matthew D. Slater (05582)  
Rathna J. Ramamurthi (*pro hac vice*)  
Madeline Hundley (*pro hac vice*)  
Gillian Isabelle (*pro hac vice*)  
Ava Kazerouni (*pro hac vice*)  
2112 Pennsylvania Ave NW  
Washington, D.C. 20037  
Tel. (202) 974-1500  
Fax (202) 974-1999  
nbamberger@cgsh.com  
mslater@cgsh.com  
rramamurthi@cgsh.com  
mhundley@cgsh.com  
gisabelle@cgsh.com  
akazerouni@cgsh.com

WASHINGTON LAWYERS' COMMITTEE FOR CIVIL  
RIGHTS AND URBAN AFFAIRS

Ryan Downer (*pro hac vice*)  
Sarah L. Bessell (30969)  
Madeleine Gates (*seeking admission to D.Md.*)

Ellie M. Driscoll (*pro hac vice*)  
700 14th St. #400  
Washington, D.C. 20005  
Tel. (202) 319-1000  
Fax (202) 319-1010  
ryan\_downer@washlaw.org  
sarah\_bessell@washlaw.org  
madeleine\_gates@washlaw.org  
ellie\_driscoll@washlaw.org

CASA, INC.

Nicholas Katz, Esq. (21920)  
8151 15th Avenue  
Hyattsville, MD 20783  
Tel. 240-491-5743  
nkatz@wearecasa.org

MAKE THE ROAD NEW YORK

Harold A. Solis (*pro hac vice*)  
Paige Austin (*pro hac vice*)  
301 Grove Street  
Brooklyn, NY 11237  
Tel. (718) 418-7690  
Fax (866) 420-9169  
harold.solis@maketheroadny.org  
paige.austin@maketheroadny.org

*Attorneys for Plaintiffs*