

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JOE NEGUSE, in his official capacity as a
Member of the U.S. House of Representatives,
et al.,

Plaintiffs,

v.

U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT *et al.*,

Defendants.

Case No. 25-cv-2463-JMC

NOTICE

Plaintiffs respectfully submit the attached proposed order requested by the Court in this morning's hearing and in the minute order issued this afternoon.

January 14, 2026

Respectfully submitted,

/s/ Christine L. Coogle

Christine L. Coogle (D.C. Bar No. 1738913)

Lisa Newman (TX Bar No. 24107878)

Paul R.Q. Wolfson (D.C. Bar No. 414759)

Brian D. Netter (D.C. Bar No. 979362)

Josephine T. Morse (D.C. Bar No. 1531317)

Skye L. Perryman (D.C. Bar No. 984573)

DEMOCRACY FORWARD FOUNDATION

P.O. Box 34553

Washington, D.C. 20043

(202) 448-9090

ccoogle@democracyforward.org

Daniel Martinez

D.C. Bar No. 90025922

Ronald A. Fein

D.C. Bar No. 90026641

Katherine M. Anthony

D.C. Bar No. 1630524

Jessica Jensen
D.C. Bar No. 1048305

AMERICAN OVERSIGHT
1030 15th Street NW, B255
Washington, DC 20005
(202) 897-2465
danny.martinez@americanoversight.org

Counsel for Plaintiffs