

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JOE NEGUSE, in his 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

**PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER OR,
IN THE ALTERNATIVE, FOR STAY UNDER 5 U.S.C. § 705**

Plaintiffs Joe Neguse, Adriano Espaillat, Bennie G. Thompson, Jamie Raskin, Robert Garcia, J. Luis Correa, Jason Crow, Veronia Escobar, Daniel S. Goldman, Jimmy Gomez, Raul Ruiz, Norma Torres, and Kelly Morrison, in their capacities as members of the U.S. House of Representatives, respectfully move under Federal Rule of Civil Procedure 65 and 5 U.S.C. § 705 for a temporary restraining order enjoining Defendants from enforcing the January 8 notice policy, ECF No. 39-1, as to Plaintiffs. In the alternative, or subsequent to an immediate temporary restraining order, Plaintiffs move for a stay of Defendants' notice policy.

Plaintiffs are likely to succeed on the merits of their claims that the notice policy violates the Administrative Procedure Act. Plaintiffs are suffering and will continue to suffer irreparable injury absent the requested relief, and the balance of equities and public interest are in Plaintiffs' favor. For these reasons and those in the supporting memorandum and accompanying materials, Plaintiffs request that the Court enter preliminary relief as set forth in the attached proposed order. Plaintiffs respectfully request a hearing on this motion no later than Friday, January 30, 2026.

Pursuant to Local Civil Rule 65.1(a), undersigned counsel certifies that counsel for Defendants, who have already noticed their appearance in this matter, receive actual notice of Plaintiffs' motion at the time of this electronic filing through CM/ECF.

January 26, 2026

Respectfully submitted,

/s/ Christine L. Coogle

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