

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

STATE OF CALIFORNIA, *et al.*,

*Plaintiffs,*

v.

KRISTI NOEM, in her official capacity as  
Secretary of Homeland Security, *et al.*,

*Defendants.*

No. 1:25-cv-13829-LTS

**PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

Pursuant to 5 U.S.C. § 706, Federal Rule of Civil Procedure 56, Local Rules 7.1 and 56.1, this Court's Standing Order, and the Order entered by the Court on January 26, 2026 (Doc. No. 85), Plaintiffs respectfully move for summary judgment on all causes of action in their complaint (Doc. No. 1), declaratory relief, vacatur of the challenged agency action, and a permanent injunction.

Wherefore, and for the reasons set forth in the accompanying memorandum of law, declarations, and evidence filed in support of this motion, Plaintiffs respectfully request that the Court enter judgment in favor of the Plaintiffs.

February 6, 2026

Respectfully submitted.

**ROB BONTA**

*Attorney General of California*

/s/ James E. Richardson

Michael L. Newman\*  
*Senior Assistant Attorney General*  
Marissa Malouff\*  
James E. Stanley\*  
*Supervising Deputy Attorneys General*  
Denise Levey\*  
Lorraine Lopez\*  
Jeanelly Orozco Alcalá\*  
James E. Richardson\*  
*Deputy Attorneys General*  
300 S. Spring St., Suite 1702  
Los Angeles, CA 90013  
(213) 269-6341  
james.richardson@doj.ca.gov

**ANDREA JOY CAMPBELL**

*Attorney General of Massachusetts*

/s/ Julia S. Canney

Michelle Pascucci (BBO No. 690889)  
Nita K. Klunder (BBO No. 689304)  
*State Trial Counsels*  
Gerard J. Cedrone (BBO No. 699674)  
*Deputy State Solicitor*  
Julia S. Canney (BBO No. 717328)  
*Assistant Attorney General*  
One Ashburton Place  
Boston, MA 02108  
(617) 963-2851  
julia.s.canney@mass.gov

**KRISTIN K. MAYES**

*Attorney General of Arizona*

/s/ Joshua G. Nomkin

Joshua G. Nomkin\*  
*Assistant Attorney General*  
2005 North Central Avenue  
Phoenix, AZ 85004  
(602) 542-3333  
joshua.nomkin@azag.gov

**PHILIP J. WEISER**

*Attorney General of Colorado*

/s/ David Moskowitz

David Moskowitz\*  
*Deputy Solicitor General*  
Nora Passamaneck\*  
*Senior Assistant Attorney General*  
1300 Broadway, #10  
Denver, CO 80203  
(720) 508-6000  
david.moskowitz@coag.gov

**WILLIAM TONG**

*Attorney General of Connecticut*

/s/ Francesca Testa

Francesca Testa\*  
*Assistant Attorney General*  
165 Capitol Avenue  
Hartford, CT 06106  
(860) 808-5210  
francesca.testa@ct.gov

**KATHLEEN JENNINGS**

*Attorney General of Delaware*

/s/ Vanessa L. Kassab

Ian R. Liston\*  
*Director of Impact Litigation*  
Vanessa L. Kassab\*  
*Deputy Attorneys General*  
820 N. French Street  
Wilmington, DE 19801  
(302) 683-8899  
vanessa.kassab@delaware.gov

**ANNE E. LOPEZ**

*Attorney General of Hawai‘i*

/s/ Kaliko‘onālani D. Fernandes

David D. Day\*  
*Special Assistant to the Attorney General*  
Kaliko‘onālani D. Fernandes\*  
*Solicitor General*  
425 Queen Street  
Honolulu, HI 96813  
(808) 586-1360  
kaliko.d.fernandes@hawaii.gov

**KWAME RAOUL**

*Attorney General of Illinois*

/s/ Aleeza Strubel

Aleeza Strubel\*  
*Complex Litigation Counsel*  
Elizabeth Morris\*  
*Deputy Chief, Special Litigation Bureau*  
115 S. LaSalle St., 35th Floor  
Chicago, IL 60603  
(312) 814-3000  
aleeza.strubel@ilag.gov

**ANTHONY G. BROWN**

*Attorney General of Maryland*

/s/ Virginia A. Williamson

Virginia A. Williamson\*  
*Assistant Attorney General*  
200 Saint Paul Place, 20th Floor  
Baltimore, MD 21202  
(410) 576-6584  
vwilliamson@oag.maryland.gov

**DANA NESSEL**

*Attorney General of Michigan*

/s/ Neil Giovanatti

Neil Giovanatti\*  
*Assistant Attorney General*  
525 W. Ottawa Street  
Lansing, MI 48909  
(517) 335-7603  
giovanattin@michigan.gov

**KEITH ELLISON**

*Attorney General of Minnesota*

/s/ Joseph R. Richie

Joseph R. Richie\*

*Special Counsel*

445 Minnesota Street, Suite 1400

St. Paul, MN 55101

(651) 300-0921

joseph.richie@ag.state.mn.us

**AARON D. FORD**

*Attorney General of Nevada*

/s/ K. Brunetti Ireland

K. Brunetti Ireland\*

*Chief of Special Litigation*

1 State of Nevada Way, Ste. 100

Las Vegas, NV 89119

(702) 486-3420

kireland@ag.nv.gov

**JENNIFER DAVENPORT**

*Acting Attorney General of New Jersey*

/s/ Max G. Lesser

Max G. Lesser\*

*Deputy Attorney General*

Melina Meneguini Layerenza\*

*Assistant Attorney General*

25 Market Street

Trenton, NJ 08625

(609) 575-6143

max.lesser@law.njoag.gov

**LETITIA JAMES**

*Attorney General of New York*

/s/ Zoe Levine

Zoe Levine\*

*Special Counsel for Immigrant Justice*

Victoria Ochoa\*

*Assistant Attorney General*

28 Liberty St.

New York, NY 10005

(212) 416-8329

zoe.levine@ag.ny.gov

**JEFF JACKSON**

*Attorney General of North Carolina*

/s/ Daniel P. Mosteller

Daniel P. Mosteller\*

*Associate Deputy Attorney General*

P.O. Box 629

Raleigh, NC 27602

(919) 716-6026

dmosteller@ncdoj.gov

**DAN RAYFIELD**

*Attorney General of Oregon*

/s/ Thomas H. Castelli

Thomas H. Castelli\*

*Senior Assistant Attorney General*

100 S.W. Market Street

Portland, OR 97201

(971) 673-1880

thomas.castelli@doj.oregon.gov

**PETER F. NERONHA**

*Attorney General of Rhode Island*

/s/ Kyla Duffy

Kyla Duffy\*

*Special Assistant Attorney General*

150 South Main Street

Providence, RI 02903

(401) 274-4400

kduffy@riag.ri.gov

**CHARITY R. CLARK**

*Attorney General of Vermont*

/s/ Jonathan T. Rose

Jonathan T. Rose\*

*Solicitor General*

109 State Street

Montpelier, VT 05609

(802) 828-3171

jonathan.rose@vermont.gov

**NICHOLAS W. BROWN**

*Attorney General of Washington*

/s/ Sara L. Wilmot

Sara L. Wilmot\*

*Assistant Attorney General*

Kate S. Worthington\*

*Assistant Attorney General*

7141 Cleanwater Drive S.W.

P.O. Box 40111

Olympia, WA 98504

(360) 709-6470

sara.wilmot@atg.wa.gov

**JOSHUA L. KAUL**

*Attorney General of Wisconsin*

/s/ Faye B. Hipsman

Faye B. Hipsman\*

*Assistant Attorney General*

P.O. Box 7857

Madison, WI 53707

(608) 264-9487

faye.hipsman@wisdoj.gov

\* admitted *pro hac vice*