

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

STATE OF MARYLAND,
200 Saint Paul Place
Baltimore, Maryland 21202,

Plaintiff,

v.

KRISTI NOEM, Secretary of Homeland Security,
2707 Martin Luther King Jr. Ave. SE
Washington, D.C. 20528

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY,
2707 Martin Luther King Jr. Ave. SE
Washington, D.C. 20528

UNITED STATES IMMIGRATION AND
CUSTOMS ENFORCEMENT,
500 12th St., SW
Washington, D.C. 20536

TODD M. LYONS, Senior Official Performing
the Duties of the Director of Immigration and
Customs Enforcement,
500 12th St., SW
Washington, D.C. 20536,

Defendants.

Civ. No. 1:26-cv-733-BAH

MOTION FOR A PRELIMINARY INJUNCTION

Plaintiff, through counsel, moves for a preliminary injunction as set forth below and for the reasons set forth in the accompanying Memorandum of Law in Support of Plaintiff's Motion for a Preliminary Injunction. Plaintiff seeks to enjoin Defendants from proceeding with construction activities required to build, retrofit, or otherwise convert the Williamsport

Warehouse, at 16220 Wright Road, alternatively identified as 10900 Hopewell Road, Williamsport, Maryland 21795, into an immigration detention facility, and from operating the Williamsport Warehouse as an immigration detention facility, during the pendency of this litigation.

The requested relief is warranted because Plaintiff is likely to show that the Defendants' actions violate NEPA and the APA; Defendants' acquisition of real property in Maryland and the imminent development and operation of this property, without providing the considered review required by the National Environmental Policy Act (NEPA) and the Administrative Procedure Act (APA), will irreparably harm Plaintiff in multiple ways; and the balance of hardships and the public interest are both in Plaintiff's favor.

WHEREFORE, Plaintiff requests that the Court enter an order:

- A. Enjoining Defendants from proceeding with renovation and/or construction activities required to build, retrofit, or otherwise convert the Williamsport Warehouse, at 16220 Wright Road, alternatively identified as 10900 Hopewell Road, Williamsport, Maryland 21795, into an immigration detention facility, during the pendency of this litigation.
- B. Enjoining Defendants from operating the Williamsport Warehouse as an immigration detention facility, during the pendency of this litigation.
- C. Requiring Defendants to file a status report within 48 hours describing all steps Defendants have taken to comply with the Court's Order.

Dated: March 19, 2026

Respectfully submitted,

ANTHONY G. BROWN
ATTORNEY GENERAL OF MARYLAND

By: /s/ Steven J. Goldstein
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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of March, 2026, the foregoing Motion for a Preliminary Injunction, supporting memorandum of law, and proposed order were electronically filed using the Court's CM/ECF system, which will effect service on counsel of record who are registered CM/ECF users.

Dated: March 19, 2026

/s/ Steven J. Goldstein
Steven J. Goldstein, Bar No. 32071