IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CHAMBER OF COMMERCE OF THE UNITED STATES OF AMERICA and ASSOCIATION OF AMERICAN UNIVERSITIES, Plaintiffs, v. UNITED STATES DEPARTMENT OF HOMELAND SECURITY et al., Defendants.	Case No. 1:25-cv-03675-BAH

PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION OR, IN THE ALTERNATIVE, SUMMARY JUDGMENT

Pursuant to Rule 65(a) of the Federal Rules of Civil Procedure, Plaintiffs the Chamber of Commerce of the United States of America and the Association of American Universities, through undersigned counsel, respectfully move the Court for a Preliminary Injunction blocking the enforcement of the presidential proclamation *Restriction on Entry of Certain Nonimmigrant Workers* (Sept. 19, 2025) (the Proclamation) and any agency action implementing the Proclamation against Plaintiffs' respective members, until such time as the Court can adjudicate Plaintiffs' claims on the merits.

For the reasons explained in the accompanying Memorandum of Law, a preliminary injunction is warranted because Plaintiffs are likely to succeed in showing that the Proclamation is unlawful, contrary to the Immigration and Naturalization Act, and in excess of the President's

authority, and because final agency action implementing the Proclamation is contrary to law and arbitrary and capricious. Moreover, a preliminary injunction is necessary to prevent irreparable harm to Plaintiffs' members and to protect the public interest.

Plaintiffs respectfully submit that no bond is necessary pursuant to Rule 65(d) of the Federal Rules of Civil Procedure.

In the alternative, pursuant to Rule 56(a) of the Federal Rules of Civil Procedure, and for the reasons described in the Memorandum of Law, the Court should award summary judgment in Plaintiffs' favor on all counts.

Pursuant to LCvR 65.1(d), Plaintiffs request a briefing schedule and hearing date as determined by the Court, provided that the Court is able to rule on Plaintiffs' motion by December 15, 2025.

Dated: October 24, 2025

Respectfully submitted,

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* *pro hac vice to be filed*

PROOF OF SERVICE

I hereby certify that I served the foregoing motion and all materials appended thereto on all defendants by causing copies to be sent by first-class mail to the following addresses:

United States Department of Homeland Security
2707 Martin Luther King Jr. Avenue, SE
Washington, D.C. 20528

United States Department of State
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601 D Street NW
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I further certify that, in accordance with Standing Order 25-55, I caused a copy of the foregoing motion and all materials appended thereto to be delivered by electronic mail to USADC.servicecivil@usdoj.gov and to Brian Hudak at brian.hudak@usdoj.gov.

Dated: October 24, 2025

/s/ *Paul W. Hughes*
Paul W. Hughes