UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

MENNONITE CHURCH USA, et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF HOMELAND SECURITY, *et al.*,

Defendants.

Civil Action No. 25-CV-00403-DLF

MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65 and Local Civil Rule 65.1, Plaintiffs hereby move this Court to issue a preliminary injunction enjoining Defendants from carrying out immigration enforcement activities at their places of worship, absent exigent circumstances or the execution of a judicial warrant, and to stay the effective date of DHS's 2025 Rescission Memo, for the reasons explained in the accompanying memorandum of law. Dated: February 21, 2025

Respectfully submitted,

<u>/s/ Kelsi Brown Corkran</u> Kelsi Brown Corkran (Bar No. 501157) Shelby B. Calambokidis (Bar No. 1684804) Julia Gegenheimer* (NY Bar No. 4949475) Alexandra Lichtenstein (Bar No. 1724947) Kate Talmor* (Maryland Bar) INSTITUTE FOR CONSTITUTIONAL ADVOCACY AND PROTECTION 600 New Jersey Avenue, NW Washington, DC 20001 (202) 661-6728

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*Pro hac vice application forthcoming. DC Bar application pending, practice pursuant to Rule 49(c)(8), DC Courts, and supervised by DC Bar member