

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

LIYANARA SANCHEZ, as next friend on behalf
of FRENDEL REYES MOTA, *et al.*,

Petitioners–Plaintiffs,

J.G.G., *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Respondents–Defendants.

Case No: 1:25-cv-00766-JEB

NOTICE IN RESPONSE TO SUGGESTION OF CONSOLIDATION

In their Opposition to Petitioners-Plaintiffs’ (“Plaintiffs”) Motion for a Preliminary Injunction, Respondents-Defendants (“Defendants”) argued that the relief Plaintiffs sought was final in nature rather than preliminary and thus the motion should be denied. ECF 182 at 35. At the hearing, the Court asked the Parties if they would be opposed to consolidating the preliminary injunction with “the Trial on the Merits” under Federal Rule of Procedure 65(a)(2). Tr. 11-12, 21-23. Consolidation requires notice to the adverse party, so the Court asked Defendants if they wished to supplement the record before any consolidation. *Id.* The Court ordered Defendants to file a notice on their position today. Defendants take the following position:

1. Defendants believe that the record is functionally complete in this case and further discovery would not alter the analysis. Thus only legal issues remain.

2. As a result, Defendants do not object to treating the preliminary injunction briefing as cross motions for summary judgment—provided that Defendants’ opposition be treated as a cross motion for summary judgment.
3. If the Court treats the pending motion as cross motions for summary judgment, then Defendants do not wish to supplement the record.

Dated: November 25, 2025

Respectfully submitted,

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Dated: November 25, 2025

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