IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ORGANIZED COMMUNITIES AGAINST)	
DEPORTATIONS, et al.,)	
)	
)	Case No. 25-cv-868
Plaintiffs,)	The Hon. John F. Kness
V.)	
)	
)	
DONALD TRUMP, in his official)	
capacity as President of the United States,)	
et al	.,)	
)	
)	
Defendants.)	

Plaintiffs' Request for Leave to Withdraw Pending Motions for a Temporary Restraining Order and Preliminary Injunction

Plaintiffs respectfully request that this Court permit them to withdraw their pending Motions for a Temporary Restraining Order and Preliminary Injunction (Doc 2 & 7). Undersigned Counsel informed Counsel for the Defendants of Plaintiffs' intent to withdraw the pending Motions. At the time of this filing, Counsel for Defendants indicated no objection to this request.

Plaintiffs' pending Motions request a court order that would *prevent* the federal officials from "threatening and/or executing Chicago-based immigration raids for the unlawful purpose of targeting and ultimately destroying the Sanctuary City movement." Doc. 7 at p. 17. On Sunday, January 26, 2025, the Defendants launched what appear to be ongoing Chicago-based immigration enforcement raids. Doc. 9-1 at p.3. In short, the status quo has changed since Plaintiffs filed their

Case: 1:25-cv-00868 Document #: 20 Filed: 01/29/25 Page 2 of 3 PageID #:326

complaint and request for emergency relief. While Plaintiffs' factfinding regarding the federal government's Chicago-based immigration enforcement remains ongoing, the changed circumstances have shifted the scope of any relief to which Plaintiffs may be entitled .

Plaintiffs make the request to withdraw their pending Motions with reasoned consideration and appreciation for the resources this Court has already expended on this matter. By withdrawing their pending Motions, Plaintiffs intend to conserve resources for both the Court and the Parties. Plaintiffs also intend to ensure that any future requests for emergency relief will be informed by the current status of Chicago-based immigration efforts.

For the reasons stated more fully above, the Plaintiffs respectfully request leave to withdraw their pending motions for emergency relief, and that the Court strike all attendant briefing deadlines and hearing dates.

Dated: January 29, 2025

Respectfully Submitted,

<u>/s/ Sheila A. Bedi</u> Sheila A. Bedi Eliana Green Community Justice and Civil Rights Clinic Northwestern Pritzker School of Law 375 E. Chicago Ave., 8th Floor Chicago, IL 60611 Phone: 312-503-2492 Sheila.bedi@law.northwestern.edu

Sejal Zota* Dinesh McCoy*

Daniel Werner* Just Futures Law 1629 K Street N.W., Suite 300 Washington, DC 20006 Phone: (617) 812-2822 sejal@justfutureslaw.org dinesh@justfutureslaw.org daniel@justfutureslaw.org *pro hac vice application forthcoming

Daniel Massoglia MK Law, LLC 2020 Janice Avenue Melrose Park, IL 60160 Phone: 312 545 8660 dm@mklawchicago.com