

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

STATE OF NEW JERSEY, *et al.*,

*Plaintiffs,*

v.

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

*Defendants.*

Case No. 1:25-cv-10139-LTS

**MOTION TO STAY PRELIMINARY INJUNCTION PENDING APPEAL**

Pursuant to Federal Rule of Civil Procedure 62, Defendants respectfully move for a stay pending appeal of the of the Court's February 13, 2025 Order, ECF No. 145, which preliminarily enjoins Defendants on a nationwide basis from implementing and enforcing Executive Order No. 14160, Protecting the Meaning and Value of American Citizenship (Jan. 20, 2025). The reasons for this motion are set forth in the accompanying memorandum of law.

Dated: February 19, 2025

Respectfully submitted

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LEAH B. FOLEY  
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*/s/ R. Charlie Merritt*

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**LOCAL RULE 7.1 CERTIFICATION**

I hereby certify that I conferred with counsel for the Plaintiffs and that the parties were unable to resolve or narrow the issues presented by this motion.

Dated: February 19, 2025

*/s/ R. Charlie Merritt*  
R. Charlie Merritt  
Trial Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF.

Dated: February 19, 2025

*/s/ R. Charlie Merritt*  
R. Charlie Merritt  
Trial Attorney