

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

STATE OF NEW JERSEY;
COMMONWEALTH OF
MASSACHUSETTS; STATE OF
CALIFORNIA; STATE OF COLORADO;
STATE OF CONNECTICUT; STATE OF
DELAWARE; DISTRICT OF COLUMBIA;
STATE OF HAWAII; STATE OF MAINE;
STATE OF MARYLAND; ATTORNEY
GENERAL DANA NESSEL FOR THE
PEOPLE OF MICHIGAN; STATE OF
MINNESOTA; STATE OF NEVADA;
STATE OF NEW MEXICO; STATE OF
NEW YORK; STATE OF NORTH
CAROLINA; STATE OF RHODE ISLAND;
STATE OF VERMONT; STATE OF
WISCONSIN; and CITY & COUNTY OF
SAN FRANCISCO,

Plaintiffs,

v.

No. 1:25-cv-10139

DONALD J. TRUMP, in his official capacity
as President of the United States; U.S.
DEPARTMENT OF STATE; MARCO
RUBIO, in his official capacity as Secretary
of State; U.S. DEPARTMENT OF
HOMELAND SECURITY; BENJAMINE
HUFFMAN, in his official capacity as
Acting Secretary of Homeland Security; U.S.
DEPARTMENT OF HEALTH AND
HUMAN SERVICES; DOROTHY FINK, in
her official capacity as Acting Secretary of
Health and Human Services; U.S. SOCIAL
SECURITY ADMINISTRATION;
MICHELLE KING, in her official capacity
as Acting Commissioner of U.S. Social
Security Administration, and UNITED
STATES OF AMERICA,

Defendants.

**PLAINTIFFS’ MOTION FOR A PRELIMINARY
INJUNCTION AND FOR EXPEDITED BRIEFING**

Pursuant to Fed. R. Civ. P. 65(a), Plaintiffs hereby move this Court to preliminarily enjoin Defendants from implementing or enforcing the Executive Order entitled “Protecting the Meaning and Value of American Citizenship” issued on January 20, 2025, pending the resolution of this action on its merits. The grounds for this motion are set forth in Plaintiffs’ accompanying memorandum of law in support of their motion.

Because the policy articulated in the Order will take effect for all children after February 19, 2025, Plaintiffs respectfully request that the Court expedite briefing on this motion and order the following briefing schedule, so that the motion may be heard and decided before February 19, 2025:

- Defendants’ Opposition: due January 28, 2025
- Plaintiffs’ Reply: due January 31, 2025

January 21, 2025

Respectfully submitted.

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY

ANDREA JOY CAMPBELL
ATTORNEY GENERAL OF MASSACHUSETTS

/s/ Jeremy M. Feigenbaum
Jeremy M. Feigenbaum *
Solicitor General
Shankar Duraiswamy*
Deputy Solicitor General
Viviana M. Hanley*
Shefali Saxena*
Elizabeth R. Walsh*
Deputy Attorneys General
Office of the Attorney General
25 Market Street
Trenton, NJ 08625
(609) 376-3377
Jeremy.feigenbaum@njoag.gov

/s/ Gerard J. Cedrone
Gerard J. Cedrone (BBO No. 699674)
Deputy State Solicitor
Jared B. Cohen (BBO No. 689217)
Assistant Attorney General
Office of the Attorney General
One Ashburton Place, 20th Floor
Boston, MA 02108
(617) 963-2282
gerard.cedrone@mass.gov
jared.b.cohen@mass.gov

*Counsel for the Commonwealth of
Massachusetts*

Counsel for the State of New Jersey

ROB BONTA
ATTORNEY GENERAL OF CALIFORNIA

PHIL WEISER
ATTORNEY GENERAL OF COLORADO

/s/ Denise Levey
Denise Levey*
Deputy Attorney General
Michael Newman
Senior Assistant Attorney General
Marissa Malouff*
Irina Trasovan*
Supervising Deputy Attorneys General
Lorraine López*
Delbert Tran*
Annabelle Wilmott*
Deputy Attorneys General
Office of the Attorney General
300 South Spring Street, Suite 1702
Los Angeles, CA 90013-1230
(213) 269-6269
Denise.Levey@doj.ca.gov

/s/ Shannon Stevenson
Shannon Stevenson
Solicitor General
Office of the Colorado Attorney General
1300 Broadway, #10
Denver, CO 80203
(720) 508-6000
Shannon.Stevenson@coag.gov

Counsel for the State of Colorado

Counsel for the State of California

WILLIAM M. TONG
ATTORNEY GENERAL OF CONNECTICUT

/s/ William M. Tong
William M. Tong*
Attorney General
Janelle Rose Medeiros*
Assistant Attorney General
Office of the Attorney General
165 Capitol Avenue
Hartford, CT 06106
(860)-808-5020
Janelle.Medeiros@ct.gov

Counsel for the State of Connecticut

BRIAN L. SCHWALB
ATTORNEY GENERAL FOR THE DISTRICT OF
COLUMBIA

/s/ Nicole S. Hill
Nicole S. Hill*
Assistant Attorney General
Public Advocacy Division
Office of the Attorney General for the District
of Columbia
400 Sixth Street, N.W.
Washington, D.C. 20001
(202) 727-4171
nicole.hill@dc.gov

Counsel for the District of Columbia

KATHLEEN JENNINGS
ATTORNEY GENERAL OF DELAWARE

/s/ Vanessa L. Kassab
Vanessa L. Kassab*
Deputy Attorney General
Delaware Department of Justice
820 N. French Street
Wilmington, DE 19801
(302) 683-8899
vanessa.kassab@delaware.gov

Counsel for the State of Delaware

ANNE E. LOPEZ
ATTORNEY GENERAL OF HAWAII

/s/ Kaliko 'onālani D. Fernandes
Solicitor General
425 Queen Street
Honolulu, Hawai'i 96813
(808) 586-1360
kaliko.d.fernandes@hawaii.gov

Counsel for the State of Hawai'i

AARON M. FREY
ATTORNEY GENERAL OF MAINE

/s/ Sean D. Magenis
Sean D. Magenis
Assistant Attorney General
Office of the Attorney General
6 State House Station
Augusta, ME 04333-0006
(207) 626-8800
Sean.d.magenis@maine.gov

Counsel for the State of Maine

DANA NESSEL
ATTORNEY GENERAL OF MICHIGAN

/s/ Toni L. Harris
Toni L. Harris*
Stephanie Service*
Neil Giovanatti*
Assistant Attorneys General
Michigan Department of Attorney General
525 W. Ottawa
Lansing, Michigan 48909
(517) 335-7603
harrist19@michigan.gov
ServiceS3@michigan.gov
GiovanattiN@michigan.gov

*Counsel for Attorney General Dana Nessel on
behalf of the People of Michigan*

ANTHONY G. BROWN
ATTORNEY GENERAL OF MARYLAND

/s/ Jessica M. Finberg
Jessica M. Finberg*
Assistant Attorney General
Office of the Attorney General
200 Saint Paul Place, 20th Floor
Baltimore, Maryland 21202
jfinberg@oag.state.md.us
410-576-6921

Counsel for the State of Maryland

KEITH ELLISON
ATTORNEY GENERAL OF MINNESOTA

/s/ John C. Keller
John C. Keller*
Chief Deputy Attorney General
445 Minnesota Street, Suite 1200
St. Paul, MN 55101-2130
651-757-1355
john.keller@ag.state.mn.us

Counsel for the State of Minnesota

AARON D. FORD

ATTORNEY GENERAL OF NEVADA

/s/ Heidi Parry Stern

Heidi Parry Stern*

Solicitor General

Office of the Nevada Attorney General

1 State of Nevada Way, Ste. 100

Las Vegas, NV 89119

(702) 486-5708

HStern@ag.nv.gov

Counsel for the State of Nevada

LETITIA JAMES

ATTORNEY GENERAL OF NEW YORK

/s/ Zoe Levine

Zoe Levine*

Special Counsel for Immigrant Justice

28 Liberty Street

New York, NY 10005

zoe.levine@ag.ny.gov

(212) 416-8329

Counsel for the State of New York

RAÚL TORREZ

ATTORNEY GENERAL OF NEW MEXICO

/s/ James W. Grayson

James W. Grayson*

Chief Deputy Attorney General

New Mexico Department of Justice

408 Galisteo St.

Santa Fe, NM 87501

(505) 218-0850

jgrayson@nmdoj.gov

Counsel for the State of New Mexico

JEFF JACKSON

ATTORNEY GENERAL OF NORTH CAROLINA

/s/ Daniel P. Mosteller

Daniel P. Mosteller*

Associate Deputy Attorney General

Laura Howard

Chief Deputy Attorney General

Associate Deputy Attorney General

North Carolina Department of Justice

PO Box 629

Raleigh, NC 27602

919-716-6026

dmosteller@ncdoj.gov

Counsel for State of North Carolina

PETER F. NERONHA

ATTORNEY GENERAL OF RHODE ISLAND

/s/ Katherine Connolly Sadeck

Katherine Connolly Sadeck (MA Bar No. 681501)

Solicitor General

Rhode Island Office of the Attorney General

150 South Main Street

Providence, RI 02903

Tel: (401) 274-4400, Ext. 2480

Fax: (401) 222-2995

ksadeck@riag.ri.gov

Counsel for the State of Rhode Island

JOSHUA L. KAUL

ATTORNEY GENERAL OF WISCONSIN

/s/ Gabe Johnson-Karp

Gabe Johnson-Karp*

Assistant Attorney General

Wisconsin Department of Justice

17 West Main Street

Post Office Box 7857

Madison, Wisconsin 53707-7857

(608) 267-8904

johnsonkarp@doj.state.wi.us

Counsel for the State of Wisconsin

CHARITY R. CLARK

ATTORNEY GENERAL OF VERMONT

/s/ Julio A. Thompson

Julio A. Thompson*

Co-Director, Civil Rights Unit

109 State Street

Montpelier, VT 06509

(802) 828-5519

julio.thompson@vermont.gov

Counsel for State of Vermont

DAVID CHIU*

CITY ATTORNEY, CITY AND COUNTY OF SAN FRANCISCO

/s/ David Chiu

Yvonne R. Meré*

Chief Deputy City Attorney

Sara J. Eisenberg*

Chief of Complex and Affirmative Litigation

Mollie M. Lee*

Chief of Strategic Advocacy

David S. Louk*

Molly J. Alarcon*

Deputy City Attorneys

Fox Plaza

1390 Market Street, 6th Fl.

San Francisco, California 94102-5408

(415) 505-0844

David.Louk@sfcityatty.org

Counsel for City and County of San Francisco

**Application for pro hac vice admission forthcoming*

LOCAL RULE 7.1 CERTIFICATE

I certify that on January 21, 2025, at 9:34 a.m., I contacted Diane Kelleher, Director, Federal Programs Branch, U.S. Department of Justice (diane.kelleher@usdoj.gov) and Rayford Farquhar, Chief, Defensive Litigation, Civil Division, U.S. Attorney's Office for the District of Massachusetts (rayford.farquhar@usdoj.gov) by email in an attempt to meet and confer regarding the foregoing request for relief. Plaintiffs have not yet had an opportunity to meet and confer with Defendants' counsel, but are proceeding with this filing given the need for prompt relief, as set forth in the accompanying memorandum of law.

/s/ Gerard J. Cedrone

Gerard J. Cedrone

Deputy State Solicitor

Office of the Attorney General

One Ashburton Place, 20th Floor

Boston, MA 02108

(617) 963-2282

gerard.cedrone@mass.gov

*Counsel for the Commonwealth of
Massachusetts*