

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

COMMUNITY ECONOMIC
DEVELOPMENT CENTER OF
SOUTHEASTERN MASSACHUSETTS,
NATIONAL PARENTS UNION,
NATIONAL KOREAN AMERICAN
SERVICE AND EDUCATION
CONSORTIUM, & UNDOCUBLACK
NETWORK,

Plaintiffs,

v.

SCOTT BESSENT, Acting Commissioner of
the Internal Revenue Service and Secretary of
the Treasury; DEPARTMENT OF THE
TREASURY; INTERNAL REVENUE
SERVICE; FRANK BISIGNANO,
Commissioner of the Social Security
Administration; SOCIAL SECURITY
ADMINISTRATION; KRISTI NOEM,
Secretary of Homeland Security; U.S.
DEPARTMENT OF HOMELAND
SECURITY; TODD LYONS, Acting Director
of U.S. Immigration and Customs
Enforcement; U.S. IMMIGRATION AND
CUSTOMS ENFORCEMENT

Defendants.

Civil Action No. 25-cv-12822-IT

**PLAINTIFFS' MOTION FOR RELIEF UNDER 5 U.S.C. §§ 705, 706 OR, IN THE
ALTERNATIVE, FOR PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiffs Community Economic Development Center of Southeastern Massachusetts (“CEDC”), National Korean American Service and Educational Consortium (“NAKASEC”), National Parents Union (“NPU”), and UndocuBlack Network respectfully request the Court enter a stay under 5 U.S.C. §§ 705, 706— or in the alternative enter a preliminary injunction—against the Internal Revenue Service (“IRS”); Scott Bessent, Acting Commissioner of the IRS; the Social Security Administration (“SSA”); Frank Bisignano, Commissioner of the SSA; U.S. Department of Homeland Security (“DHS”); Kristi Noem, Secretary of Homeland Security; U.S. Immigration and Customs Enforcement (“ICE”); Todd Lyons, Acting Director of ICE, (collectively “Defendants”), pausing the implementation of information sharing agreements, policies and procedures between IRS and ICE and between SSA and ICE, and staying and/or preliminarily vacating the enforcement and performance of these information sharing agreements, policies, and procedures.

As set forth in greater detail in the accompanying memorandum of points and authorities, Plaintiffs have established that they will likely succeed on the merits of their claims under the Administrative Procedure Act that the information sharing agreements, policies and procedures are contrary to law because they violate the privacy protections for taxpayer information under 28 U.S.C. § 6103, they are arbitrary and capricious, and they are contrary to the Constitution because they violate the First Amendment rights of Plaintiffs and their members. Plaintiffs have demonstrated a strong likelihood of success on the merits of their independent claims that the agencies are acting ultra vires and impairing Plaintiffs’ First Amendment rights and shown that, absent relief, they will suffer irreparable harm, with the balance of equities and the public interest weighing in favor of granting a stay and preliminary injunction. The Court should set the bond at zero dollars because Defendants will suffer no financial harm.

Respectfully submitted,

GREATER BOSTON LEGAL SERVICES

Dated: November 3, 2025

By: /s/ Luz Arevalo

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Attorneys for Plaintiffs

LOCAL RULE 7.1(a)(2) CERTIFICATION

Pursuant to Local Rule 7.1(a)(2) and Federal Rule of Civil Procedure 65, counsel for Plaintiffs certify that they have sent counsel for all Defendants notice of this motion and they have met and conferred in good faith with Defendants' counsel concerning this motion, in an effort to narrow or resolve the issues before filing.

/s/ Leo L. Lam

Leo L. Lam

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail.

/s/ Leo L. Lam

Leo L. Lam