IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

CASA, INC. *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP *et al.*,

Defendants.

Case No.: 8:25-cv-00201-DLB
Honorable Deborah L. Boardman

PLAINTIFFS' MOTION FOR ADDITIONAL CLASSWIDE PRELIMINARY INJUNCTIVE RELIEF OR A CLASSWIDE TEMPORARY RESTRAINING ORDER

Plaintiffs, by and through their undersigned counsel, hereby move the Court pursuant to Rule 65 of the Federal Rules of Civil Procedure for additional or modified preliminary injunctive relief to protect the rights of the certified class and preserve the status quo.

Specifically, Plaintiffs seek an order barring enforcement of Exec. Order No. 14418, "Continuing To Protect the Meaning and Value of American Citizenship," against the class during the pendency of the litigation. *See* 91 Fed. Reg. 51991 (Aug. 6, 2026), ECF 161-1 ("2026 Executive Order"). For the reasons set forth in the attached memorandum of law, the 2026 Executive Order, as applied to the certified class, violates the Citizenship Clause of the Fourteenth Amendment and conflicts directly with the Supreme Court's recent decision in *Trump v. Barbara*, 146 S. Ct. 2438 (2026). The President has no power to unilaterally rewrite the Constitution, and he should be enjoined from denying citizenship to the members of the certified class under this or any other Executive Order.

Alternatively, Plaintiffs respectfully request that the Court issue a temporary restraining order or additional preliminary injunction barring enforcement of the 2026 Executive Order for 14 days after issuance of the guidance contemplated in Section 3(b) of the Order, to prevent any immediate enforcement of the Order against members of the class upon issuance of the guidance.

On August 24, 2026, counsel for Plaintiffs conferred with counsel for Defendants about this motion. Counsel for Defendants stated that Defendants oppose the motion.

Respectfully submitted this August 24, 2026,

/s/ William Powell
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CERTIFICATE OF SERVICE AND RULE 65 CERTIFICATION

I hereby certify that, on August 24, 2026, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. Notice of this filing will be sent to all counsel who have entered an appearance by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. All defendants are currently represented by counsel who have entered an appearance and who receive notification of filings through the CM/ECF system. The notice provided by the CM/ECF system is sufficient to provide notice to all counsel of this filing. Fed. R. Civ. P. 5(b)(2)(E); Electronic Case Filing Policies & Procedures Manual 2.E; Standing Order 2003-08.

/s/ William Powell
William Powell