

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
GREENBELT DIVISION**

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 A TEMPORARY RESTRAINING ORDER AND  
PRELIMINARY INJUNCTION**

Plaintiffs, by and through their undersigned counsel, hereby move the Court pursuant to Rule 65 of the Federal Rules of Civil Procedure for a temporary restraining order and preliminary injunction enjoining the enforcement of Defendant President Donald J. Trump's Executive Order entitled "Protecting the Meaning and Value of American Citizenship" (January 20, 2025). As set forth in the attached memorandum of law, the Executive Order violates the plain language of the Fourteenth Amendment and 8 U.S.C. § 1401(a) and conflicts directly with binding Supreme Court precedent. Plaintiffs respectfully request that this Court issue a temporary restraining order and preliminary injunction to prevent the imminent violation of Constitutional rights and prevent irreparable harm to Individual Plaintiffs, Organizational Plaintiffs' members, and their future children, and to maintain the status quo for babies being born within the United States to parents who are covered

by the Executive Order. In support of this motion, Plaintiffs submit the attached memorandum of law and accompanying exhibits.

Respectfully submitted this January 21, 2025,

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/s/ Joseph W. Mead

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*\*Motion for admission pro hac vice forthcoming.*

**CERTIFICATE OF SERVICE**

I hereby certify that, on January 21, 2025, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. There is currently no Counsel of Record for Defendants. I certify that I will serve the foregoing motion, the accompanying brief in support, and all exhibits, on Defendants.

/s/ Joseph W. Mead  
Joseph W. Mead