

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

**Philadelphia Yearly Meeting of the
Religious Society of Friends, *et al.*,**

Plaintiffs,

v.

**U.S. Department of Homeland Security, *et
al.*,**

Defendants.

Civil Case No. 8:25-cv-243-TDC

**PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

Under Federal Rule of Civil Procedure 65 and this Court's February 4, 2025 Order following the January 31, 2025 Case Management Conference, *see* Dkt. No. 22, Plaintiffs Philadelphia Yearly Meeting of the Religious Society of Friends, New England Yearly Meeting of the Religious Society of Friends, Baltimore Yearly Meeting of the Religious Society of Friends, New York Yearly Meeting of the Religious Society of Friends, Adelphi Friends Meeting of the Religious Society of Friends, Richmond Friends Meeting of the Religious Society of Friends, Cooperative Baptist Fellowship, and Sikh Temple Sacramento, on their own behalf and on behalf of their members, move for a temporary restraining order and preliminary injunction enjoining the Department of Homeland Security and its constituent agencies from implementing, enforcing, or acting pursuant to DHS's 2025 Policy regarding enforcement actions in or near houses of worship—as announced in the January 20, 2025 memo from acting DHS secretary Benjamine Huffman—or from carrying out immigration-enforcement operations at houses of worship absent a judicial warrant or exigent circumstances until the Court can further consider the merits. As set

forth in more detail in the accompanying memorandum in support of this motion and accompanying exhibits, the 2025 Policy violates the First Amendment of the U.S. Constitution and the Religious Freedom Restoration Act. The 2025 Policy is already causing serious injury to Plaintiffs and people of faith around the country, and the government will not be injured or otherwise prejudiced if the Policy is temporarily or preliminarily enjoined.

February 4, 2025

Respectfully submitted,

/s/ Alethea Anne Swift

Alethea Anne Swift (Bar No. 30829)

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Counsel for Plaintiffs

⁺ *Application for full admission pending*

**Admitted pro hac vice*

CERTIFICATE OF SERVICE

I, Alethea Anne Swift, hereby certify the foregoing document was served on Defendants via CM/ECF in compliance with Federal Rule of Civil Procedure 5(a). Because at least one attorney for Defendants has not yet entered an appearance in this matter, Defendants were additionally served via emails to andrew.warden@usdoj.gov and kristina.wolfe@usdoj.gov.



Alethea Anne Swift
Counsel for Plaintiffs