IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

National Association of Diversity Officers in Higher Education, et al.,

Plaintiffs,

v.

Donald J. Trump, in his official capacity as President of the United States, et al.,

Defendants.

Case No. 25-cv-333 (ABA)

MOTION TO STAY INJUNCTION PENDING APPEAL

Pursuant to Federal Rule of Civil Procedure 62, Defendants respectfully move for stay pending resolution of the appeal of this Court's Memorandum Opinion and Order, ECF Nos. 44 & 45, which preliminarily enjoin "Defendants other than the President, and other persons who are in active concert or participation with Defendants," on a nationwide basis from implementing and enforcing certain provisions in Executive Order No. 14151 and Executive Order No. 14173. *See* ECF No. 45 at 3. In the alternative, and at a minimum, Defendants request that this Court stay the nationwide application of the injunction. The reasons for this motion are set forth in the accompanying memorandum.

Respectfully submitted,

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/s/ Pardis Gheibi

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CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2025, I electronically filed this document with the Court by using the CM/ECF system, and that this document was distributed via the Court's CM/ECF system.

/s/ Pardis Gheibi