

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

AMERICAN ASSOCIATION OF
COLLEGES FOR TEACHER
EDUCATION, *et al.*,

Plaintiffs,

v.

DENISE CARTER, *et al.*,

Defendants.

Civil Action No. 25-cv-00702

**PLAINTIFFS AMERICAN ASSOCIATION OF COLLEGES FOR TEACHER
EDUCATION, NATIONAL CENTER FOR TEACHER RESIDENCIES, AND THE
MARYLAND ASSOCIATION OF COLLEGES FOR TEACHER EDUCATION’S
MOTION FOR TEMPORARY RESTRAINING ORDER/PRELIMINARY INJUNCTION**

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiffs the American Association of Colleges for Teacher Education, the National Center for Teacher Residencies, and the Maryland Association of Colleges for Teacher Education (collectively, “Plaintiffs”), by and through their undersigned counsel, respectfully applies to the Court for issuance of a temporary restraining order and/or preliminary injunction against Defendants Denise Carter, in her official capacity as Acting Secretary of Education, the United States Department of Education, and Donald Trump, in his official capacity as President of the United States, (collectively, “Defendants”) as follows:

(a) Enjoining Defendants’ enforcement of the termination of the TQP, SEED, and TSL grants;

(b) Ordering such grant funding reinstated forthwith;

(c) Ordering Defendants to provide the Grant Recipients reimbursement for all otherwise allowable expenditures incurred between the date of termination and the Court’s order;

(d) Enjoining Defendants' termination of any additional TQP, SEED, and TSL grants if such termination would be inconsistent with the Court's order; and

(e) Removing the route pay grant conditions from TQP, SEED, and TSL grants.

This Motion is supported by a Memorandum of Law, Declarations, and the exhibits thereto, which are incorporated herein by reference.

WHEREFORE, Plaintiffs respectfully request that this Court grant their Motion for Temporary Restraining Order and/or Preliminary Injunction and issue an Order enjoining Defendants.

[Signatures Follow on Next Page]

Dated: March 3, 2025

Respectfully Submitted,

/s/ Daniel M. Moore

Daniel M. Moore (Bar No. 21834)

SAUL EWING LLP

1001 Fleet Street, Ninth Floor

Baltimore, Maryland 21202-4359

Telephone: (410) 332-8734

Facsimile: (410) 332-8862

daniel.moore@saul.com

Joshua W.B. Richards (*Pro Hac Vice Forthcoming*)

Carolyn M. Toll (*Pro Hac Vice Forthcoming*)

SAUL EWING LLP

1500 Market Street, 38th Floor

Philadelphia, Pennsylvania 19102

Tel: (215) 972-7737

joshua.richards@saul.com

carolyn.toll@saul.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of March, 2025, a copy of the foregoing **(1) Plaintiffs' Motion for Temporary Restraining Order/Preliminary Injunction, (2) Memorandum of Law in Support of Plaintiffs' Motion for Temporary Restraining Order/Preliminary Injunction and Supporting Documents; and (3) Proposed Order** will be served on the following via Private Process Server and email contemporaneously with service of the Complaint:

DENISE CARTER, in her official capacity as Acting Secretary of Education
400 Maryland Avenue, SW
Washington, DC 20202,

U.S. DEPARTMENT OF EDUCATION,
400 Maryland Avenue, SW
Washington, DC 20202,

DONALD J. TRUMP, in his official capacity as President of the United States, c/o Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

PAMELA BONDI, United States Attorney General
950 Pennsylvania Avenue
Washington, DC 20530-0001

KELLY O. HAYES, Acting United States Attorney
United States Attorney's Office for the District of Maryland
36 S. Charles Street, 4th Floor
Baltimore, Maryland 21201

/s/ Daniel M. Moore
Daniel M. Moore