

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

STATE OF MARYLAND, *et al.*,

\*

Plaintiffs,

\*

v.

\*

UNITED STATES DEPARTMENT OF  
AGRICULTURE, *et al.*,

\*

Case No. 1:25-cv-748-JKB

\*

Defendants.

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\* \* \* \* \*

**PLAINTIFF STATES' MOTION  
FOR A SECTION 705 STAY AND PRELIMINARY INJUNCTION**

Plaintiff States seek an order entering a stay under Section 705 of the Administrative Procedure Act and a preliminary injunction. For the reasons explained in greater detail in the accompanying memorandum of law, Plaintiff States ask the Court to enter a Section 705 stay and a preliminary injunction against all Defendants,

1. Staying all purported terminations of Affected Probationary Employees;
2. Reinstating all Affected Probationary Employees, including any who have yet to be reinstated;
3. Prohibiting Defendants from conducting any Reduction in Force ("RIF") without complying with the notice requirements in 5 U.S.C. § 3502, relevant regulations in Title 5, Chapter 1 of the Code of Federal Regulations, and all other applicable law, to ensure

Plaintiff States receive adequate notice, as required by law, in order to conduct rapid response activities; and

4. Requiring the Defendants to submit status reports at regular intervals as further directed by this Court to provide further detailed information on their compliance with this Court's orders.

March 20, 2025

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**CERTIFICATE OF SERVICE**

I certify that, on this 20th day of March, 2025 Plaintiff States' Motion for a Section 705 Stay and Preliminary Injunction were served by CM/ECF on all counsel of record.

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