

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

Solutions in Hometown Connections, et al.,

Plaintiffs,

v.

Kristi Noem, et al.,

Defendants.

Civil Case No. 8:25-cv-885-LKG

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION & APA § 705 STAY

Under Federal Rule of Civil Procedure 65, and Section 705 of the Administrative Procedure Act, Plaintiffs Solutions in Hometown Connections, Central American Resource Center, Coalition for Humane Immigrant Rights, Community Center for Immigrants Inc., English Skills Learning Center, Michigan Organizing Project doing business as Michigan United, Hebrew Immigrant Aid Society and Council Migration Services of Philadelphia doing business as HIAS Pennsylvania, Immigrant Law Center of Minnesota, Instituto del Progreso Latino, and Massachusetts Immigrant and Refugee Advocacy Coalition move for a preliminary injunction and stay of final agency action under 5 U.S.C. § 705 to prevent Defendants from causing further irreparable harm to Plaintiffs before the Court can consider the merits of this case. As set forth in the memorandum of law in support of this motion, Defendants' actions violate the Administrative Procedure Act and the Constitution, and are ultra vires.

Plaintiffs request that this Court grant preliminary relief to restore the Citizenship and Integration Grant Program that Defendants arbitrarily, capriciously, and unlawfully dismantled.

Since the dismantling began in early February, Plaintiffs have scrambled to continue providing to their clients the citizenship and naturalization services their funding supported. Some have already had to shrink their services and lay off staff, and others are quickly approaching the point where they will be unable to continue paying their bills without reducing services or staffing. Immediate relief is necessary so that Plaintiffs preserve the ability to run their naturalization programs, have funding for the ongoing legal representation obligations they took on in reliance on Defendants' funding, and maintain the goodwill and reputations they have built over years as trusted service providers for lawful permanent residents looking to become U.S. citizens.

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⁺*Application for full admission pending*

**Admitted pro hac vice*

*** Motion to appear pro hac vice forthcoming*

Respectfully submitted,

/s/ Bradley Girard

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