

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JOE NEGUSE, in his official capacity as a
Member of the U.S. House of Representatives,
et al.,

Plaintiffs,

v.

U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT *et al.*,

Defendants.

Case No. 25-cv-2463-JMC

**PLAINTIFFS' MOTION FOR STAY UNDER 5 U.S.C. § 705 OR,
IN THE ALTERNATIVE, FOR PRELIMINARY INJUNCTION**

Plaintiffs Joe Neguse, Adriano Espaillat, Bennie G. Thompson, Jamie Raskin, Robert Gracia, J. Luis Correa, Jason Crow, Veronia Escobar, Daniel S. Goldman, Jimmy Gomez, Raul Ruiz, and Norma Torres, in their official capacities as members of the U.S. House of Representatives, respectfully move under 5 U.S.C. § 705 and Federal Rule of Civil Procedure 65 for an order staying or, in the alternative, preliminarily enjoining Defendants' oversight visit policy and practice, requiring members of Congress to provide at least seven days' written notice before conducting oversight visits and preventing oversight visits to U.S. Immigration and Customs Enforcement (ICE) field offices.

Plaintiffs are likely to succeed on the merits of their claims that the oversight visit policy violates the Administrative Procedure Act. Plaintiffs are suffering and will continue to suffer irreparable injury absent the requested relief, and the balance of equities and public interest are in Plaintiffs' favor. For these reasons and those in the supporting memorandum and accompanying materials, Plaintiffs respectfully request that the Court enter preliminary relief as set forth in the attached proposed order. Plaintiffs request a hearing at the Court's earliest convenience.

August 8, 2025

Respectfully submitted,

/s/ Christine L. Coogle

Christine L. Coogle (D.C. Bar No. 1738913)

Lisa Newman (TX Bar No. 24107878)

Paul R.Q. Wolfson (D.C. Bar No. 414759)

Brian D. Netter (D.C. Bar No. 979362)

Josephine T. Morse (D.C. Bar No. 1531317)

Skye L. Perryman (D.C. Bar No. 984573)

DEMOCRACY FORWARD FOUNDATION

P.O. Box 34553

Washington, D.C. 20043

(202) 448-9090

ccoogle@democracyforward.org

Daniel Martinez

D.C. Bar No. 90025922

Ronald A. Fein

D.C. Bar No. 90026641

Katherine M. Anthony

D.C. Bar No. 1630524

Jessica Jensen

D.C. Bar No. 1048305

AMERICAN OVERSIGHT

1030 15th Street NW, B255

Washington, DC 20005

(202) 897-2465

danny.martinez@americanoversight.org

Counsel for Plaintiffs