

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

CASA, INC.,

*Plaintiff,*

v.

KRISTI NOEM, Secretary of Homeland  
Security, in her official capacity, & U.S.  
DEPARTMENT OF HOMELAND  
SECURITY

*Defendants.*

**Case No.: 8:25-cv-1484**

**PLAINTIFF CASA, INC.'S MOTION FOR A STAY OF AGENCY ACTION  
OR PARTIAL SUMMARY JUDGMENT**

Plaintiff CASA, Inc., by and through its undersigned counsel, respectfully move for:

1. An order postponing the effective dates of Defendants purported terminations of the Temporary Protected Status (TPS) designations for Afghanistan and Cameroon, pursuant to 5 U.S.C. § 705 of the Administrative Procedure Act (APA); or
2. Summary judgment as to Counts I and II of the Complaint, declaring unlawful and setting aside the purported TPS designations for Afghanistan and Cameroon; and declaring that the TPS designation is extended until at least November 20, 2025, and the TPS designation is extended until at least December 7, 2025, pursuant to 5 U.S.C. § 706 of the APA and Federal Rule of Civil Procedure 56.

In support of this motion, Plaintiffs submit the attached memorandum of law and accompanying exhibits.

May 7, 2025

Nicholas Katz, Esq. (D. Md. 21920)  
CASA, INC.  
8151 15th Avenue  
Hyattsville, MD 20783  
240-491-5743  
nkatz@wearecasa.org

Ryan C. Downer\*  
Sarah L. Bessell (D. Md. 30969)  
WASHINGTON LAWYERS' COMMITTEE FOR  
CIVIL RIGHTS AND URBAN AFFAIRS  
700 14th St. #400  
Washington, D.C. 20005  
Tel. (202) 319-1000  
Fax (202) 319-1010  
ryan\_downer@washlaw.org  
sarah\_bessell@washlaw.org

Respectfully submitted,

s/ Jonathan L. Backer  
Jonathan L. Backer (D. Md. 20000)  
Rupa Bhattacharyya\*  
Julia Gegenheimer†  
Joseph W. Mead (D. Md. 22335)  
Mary B. McCord (D. Md. 21998)  
Samuel P. Siegel†  
INSTITUTE FOR CONSTITUTIONAL ADVOCACY  
AND PROTECTION  
Georgetown University Law Center  
600 New Jersey Ave., N.W.  
Washington, D.C. 20001  
Phone: (202) 661-6671  
Fax: (202) 661-6730  
jb2845@georgetown.edu  
jg1370@georgetown.edu  
jm3468@georgetown.edu  
mbm7@georgetown.edu  
rb1796@georgetown.edu  
ss5427@georgetown.edu

*Attorneys for CASA*

*\*Motion for admission pro hac vice forthcoming.*

*†Motion for admission pro hac vice forthcoming. DC Bar application pending, practice pursuant to Rule 49(c)(8), DC Courts, and supervised by DC Bar member.*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 7, 2025, a copy of the foregoing document was mailed via certified mail, postage prepaid, to Defendants and their counsel at the following addresses:

United States Civil Process Clerk  
United States Attorney's Office for the District of Maryland  
6406 Ivy Lane, Suite 800  
Greenbelt, MD 20770

Secretary Kristi Noem & Department of Homeland Security  
2707 Martin Luther King Jr. Ave., SE  
Washington, D.C. 20528

Attorney General of the United States  
U.S. Department of Justice  
950 Pennsylvania Ave. NW  
Washington, DC 20530-001

/s Jonathan L. Backer  
Jonathan Backer