

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

NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE
(NAACP), AMERICAN FEDERATION OF
TEACHERS, AFL-CIO, and THE UNITED
FOOD AND COMMERCIAL WORKERS
INTERNATIONAL UNION, AFL-CIO, CLC,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as
President of the United States, JEFFERSON
BEAUREGARD SESSIONS, III, in his official
capacity as Attorney General of the United
States, KRISTJEN NIELSON, in her official
capacity as Secretary of Homeland Security,
U.S. CITIZENSHIP AND IMMIGRATION
SERVICES, U.S. IMMIGRATION AND
CUSTOMS ENFORCEMENT,
DEPARTMENT OF HOMELAND
SECURITY, UNITED STATES OF
AMERICA,

Defendants.

**PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT AND/OR
PRELIMINARY INJUNCTION**

Civil Action No. 17-cv-1907

THE TRUSTEES OF PRINCETON
UNIVERSITY, MICROSOFT
CORPORATION, and
MARIA DE LA CRUZ PERALES SANCHEZ,

Plaintiffs,

v.

UNITED STATES OF AMERICA, U.S.
DEPARTMENT OF HOMELAND
SECURITY, and KRISTJEN NIELSON, in her
official capacity as Secretary of the Department
of Homeland Security,

Defendants.

Civil Action No. 17-cv-2325

**PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT AND/OR PRELIMINARY
INJUNCTION**

For the reasons set forth in the accompanying memorandum of law, Plaintiffs respectfully request that this Court grant summary judgment or, in the alternative, a preliminary injunction, on their claim that Defendants' termination of the Deferred Action for Childhood Arrival Program violates the Administrative Procedure Act. *See* Fed. R. Civ. P. 56, 65. Plaintiffs further request that this Court preliminarily enjoin Defendants from modifying, in policy or practice, the use of information furnished pursuant to the DACA program in ways that could result in the detention or removal of current or former DACA applicants, without first providing Plaintiffs reasonable notice of and an opportunity to contest any such modification in this Court. *See* Fed. R. Civ. P. 65.

Dated: December 15, 2017

Respectfully Submitted,

By: /s/ Joseph M. Sellers

Joseph M. Sellers

D.C. Bar No. 318410

Julie S. Selesnick

D.C. Bar No. 485558

Julia A. Horwitz

D.C. Bar No. 1018561

Cohen Milstein Sellers & Toll PLLC

1100 New York Ave. NW, Fifth Floor

Washington, DC 20005

T: (202) 408-4600

F: (202) 408-4699

jsellers@cohenmilstein.com

jselesnick@cohenmilstein.com

jhorwitz@cohenmilstein.com

*Attorney for Plaintiffs NAACP; American
Federation of Teachers, AFL-CIO; United
Food and Commercial International Union,
AFL-CIO, CLC*

By: /s/ Thomas J. Perrelli

Thomas J. Perrelli

D.C. Bar No. 438929

Lindsay C. Harrison

D.C. Bar No. 977407

Sam Hirsch

D.C. Bar No. 455688

Ishan Bhabha

D.C. Bar No. 101567

Ben Eidelson

D.C. Bar No. 1031574

Alex Trepp

D.C. Bar No. 1031036*

JENNER & BLOCK LLP

1099 New York Avenue, NW

Suite 900

Washington, DC 20001-4412

Phone 202 639-6000

Fax 202 639-6066

tperrelli@jenner.com

lharrison@jenner.com

shirsch@jenner.com

ibhabha@jenner.com

beidelson@jenner.com

atrepp@jenner.com

*Attorneys for The Trustees of
Princeton University, Microsoft
Corporation, and Maria De La Cruz
Perales Sanchez*

**Application for Admission to District Court
for District of Columbia Pending*