



INSTITUTE FOR CONSTITUTIONAL ADVOCACY AND PROTECTION
GEORGETOWN UNIVERSITY LAW CENTER

October 16, 2019

VIA ECF

The Honorable Paul W. Grimm
United States District Court for the District of Maryland
6500 Cherrywood Lane
Greenbelt, MD 20770

Re: CASA de Maryland, Inc. et al. v. Trump et al.

PWG 19-cv-2715

Dear Judge Grimm:

On October 14, 2019, the Court entered a preliminary injunction in *CASA de Maryland, Inc. v. Trump*, No. PWG 19-cv-2715. Mem. Op. & Order, ECF No. 65. The Order names Defendants U.S. Department of Homeland Security; Kevin K. McAleenan, in his official capacity as Acting Secretary of Homeland Security; and Kenneth T. Cuccinelli II, in his official capacity as Acting Director of the U.S. Citizenship and Immigration Services (USCIS) as enjoined parties. Defendant USCIS is not enjoined by the Order.

Plaintiffs believe that the Order, as written, accomplishes the purpose of preliminarily enjoining the enforcement of the Public Charge Rule. However, Plaintiffs respectfully request that the Order be revised to include USCIS among the enjoined parties. Defense counsel does not oppose the addition of USCIS as an enjoined party but believes the injunction is adequate as written. A revised proposed order is attached.

Sincerely,

Mary B. McCord
Institute for Constitutional Advocacy and Protection
Georgetown University Law Center
(202) 661-6607
mbm7@georgetown.edu

Cc: All counsel of record (via ECF)

[PROPOSED] REVISED ORDER

For the reasons stated in the Memorandum Opinion issued on October 14, 2019, ECF No. 65, it is, this ____ day of October, 2019, hereby ORDERED that Plaintiffs' Corrected Motion for Preliminary Injunction, ECF No. 28, IS GRANTED as follows:

1. Pursuant to Federal Rule of Civil Procedure 65(a), Defendants U.S. DEPARTMENT OF HOMELAND SECURITY, KEVIN K. McALEENAN, in his official capacity as Acting Secretary of Homeland Security, U.S. CUSTOMS AND IMMIGRATION SERVICES, and KENNETH T. CUCCINELLI II, in his official capacity as Acting Director, U.S. Citizenship and Immigration Services, are ENJOINED from
 - a. Enforcing, applying, or treating as effective, or allowing persons under their control to enforce, apply, or treat as effective, the Public Charge Rule; and
 - b. Implementing, considering in connection with any application, or requiring the use of any new or updated forms whose submission would be required under the Rule, including the new Form I-944, titled "Declaration of Self Sufficiency," and the updated Form I-485, titled "Application to Register Permanent Residence of Adjust Status"; and,
2. Pursuant to 5 U.S.C. § 705, the effective date of the Rule is POSTPONED pending further Order of the Court.

Paul W. Grimm
United States District Judge