

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

O. DOE; BRAZILIAN WORKER CENTER, INC.;
LA COLABORATIVA,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States; et al.,

Defendants.

Civil Action No. 25-CV-
10135

PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

Pursuant to Fed. R. Civ. P. 65(a), Plaintiffs hereby move this Court to preliminarily enjoin Defendants from implementing or enforcing the Executive Order entitled “Protecting the Meaning and Value of American Citizenship,” issued on January 20, 2025 and attached as Exhibit A to Plaintiffs’ Complaint. The grounds for this motion are set forth in the accompanying memorandum of law.

Dated: January 23, 2025

Respectfully submitted,

/s/ Oren Sellstrom

Oren Sellstrom (BBO #569045)

Iván Espinoza-Madrigal (BBO # 708080)

Jacob Love (BBO #699613)

Mirian Albert (BBO #710093)

Lawyers for Civil Rights

61 Batterymarch Street, 5th Floor

Boston, MA 02110

(617) 482-1145

osellstrom@lawyersforcivilrights.org

LOCAL RULE 7.1 CERTIFICATE

I certify that on January 23, 2025, I spoke with Brad P. Rosenberg, Special Counsel, Federal Programs Branch, Civil Division, U.S. Department of Justice, in order to meet and confer regarding this matter. We were unable to resolve or narrow the issue.

Dated: January 23, 2025

/s/ Oren Sellstrom
Oren Sellstrom (BBO #569045)
Lawyers for Civil Rights
61 Batterymarch Street, 5th Floor
Boston, MA 02110
(617) 482-1145
osellstrom@lawyersforcivilrights.org

CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2025, the above-captioned document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants.

/s/Oren Sellstrom
Oren Sellstrom (BBO #569045)
Lawyers for Civil Rights
61 Batterymarch Street, 5th Floor
Boston, MA 02110
(617) 482-1145
osellstrom@lawyersforcivilrights.org