

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

COOK COUNTY ILLINOIS,
et al.

Plaintiffs,

v.

KEVIN K. McALEENAN, in his official
capacity as Acting Secretary of U.S.
Department of Homeland Security,
et al.

Defendants.

Civil Action No. 1:19-cv-06334

Hon. Gary S. Feinerman

MOTION FOR STAY OF INJUNCTION PENDING APPEAL

Defendants respectfully move the Court to stay pending appeal the Court's order granting a statewide preliminary injunction in this matter. For the reasons discussed in Defendants' Memorandum of Law in Support of Defendants' Motion for Stay of Injunction Pending Appeal, this Court should stay its preliminary injunction pending the resolution of the government's appeal. At a minimum, it should issue a stay of the injunction insofar as it applies beyond redressing the relevant injuries to Plaintiffs in this case. Defendants conferred with Plaintiffs, who oppose this request.

Dated: October 25, 2019

Respectfully submitted,

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Director, Federal Programs Branch

/s/ Joshua M. Kolsky

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