

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
DAYTON DIVISION**

**STATE OF ARIZONA, et al.**

Plaintiffs,

v.

**JOSEPH R. BIDEN, et al.**

Defendants.

Case No. 3:21cv00314

The Honorable Michael J. Newman

**EMERGENCY MOTION FOR AN ADMINISTRATIVE STAY**

Earlier today, the Court entered a multi-part nationwide injunction against a memorandum issued by the Secretary of Homeland Security. Defendants are currently reviewing and interpreting the Court's written opinion and determining Defendants' obligations under the Court's injunction.

Complying with the Court's injunction will, at the least, require a shift in the way that DHS has been operating for the past several months. It will, at the least, require Defendants to develop and disseminate usable operational guidance to the approximately 12,000 immigration officers within U.S. Immigration and Customs Enforcement. Defendants therefore respectfully request that the Court enter a two-week administrative stay of its order, so that Defendants may implement the injunction in an orderly fashion and potentially seek further relief, such as clarification or a motion for stay pending appeal, from this Court or other courts, as necessary. If Defendants elect to move for a stay or other relief before this Court, they will do so as soon as possible. Plaintiffs oppose this motion.

Defendants respectfully request that the Court rule on Defendants' motion for a two-week administrative stay as soon as possible.

Dated: March 22, 2022

Respectfully submitted,

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/s/ Michael F. Knapp

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**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was filed electronically  
(via CM/ECF) on March 22, 2022.

*/s/ Michael F. Knapp*\_\_\_\_\_

MICHAEL F. KNAPP