

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

“BARBARA,” *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, *et al.*,

Defendants.

Case No. 1:25-cv-244-JL-AJ

NOTICE TO COURT REGARDING PENDING MOTIONS

On September 22, 2026, the Court held a status conference in which it further explained its procedural concerns regarding the motions Plaintiffs have filed in this case to modify or clarify the existing injunction (ECF No. 80); to supplement the Complaint and add new plaintiffs (ECF No. 90); to certify a new class of individuals subject to the new executive order (ECF No. 91); and to issue a new preliminary injunction protecting that class (ECF No. 92). Among other things, the Court indicated that in its view the supplemental complaint effectively represented a new case and should be filed as such.

As Plaintiffs explained, their overriding concern is obtaining relief for the putative class in a timely manner. As such, Plaintiffs appreciate the Court's explanations at this stage, and respectfully withdraw the pending motions (ECF Nos. 80, 90, 91, 92).

Plaintiff Barbara will continue as a plaintiff in this suit. The new plaintiffs, other than Barbara's daughter Beatrice, will refile their claims as a new action. Because none of those plaintiffs reside in this district, those plaintiffs (Nathan, Clara, Patricia, and Edward) will file elsewhere.

Plaintiffs will confer with Defendants regarding next steps in bringing the existing claims in this case to final judgment.

Dated: September 23, 2026

/s/ SangYeob Kim

SangYeob Kim (N.H. Bar No. 266657)
Gilles R. Bissonnette (N.H. Bar No.
265393)
Henry R. Klementowicz (N.H. Bar No.
21177)
Chelsea Eddy (N.H. Bar No. 276248)
Caroline Meade (N.H. Bar No. 281341)
Maria Savarese (N.H. Bar No. 273285)
AMERICAN CIVIL LIBERTIES UNION OF NEW
HAMPSHIRE
18 Low Avenue
Concord, NH 03301
T: (603) 333-2081
sangyeob@aclu-nh.org
gilles@aclu-nh.org
henry@aclu-nh.org
chelsea@aclu-nh.org
caroline@aclu-nh.org
maria@aclu-nh.org

Elizabeth Caldwell*
Brittany Carter*
NAACP LEGAL DEFENSE & EDUCATIONAL
FUND, INC.
40 Rector St., FL 5, New York, NY 10006
T: (212) 217-1690
bcaldwell@naacpldf.org
bcarter@naacpldf.org

Morgan Humphrey*
Mide Odunsi*
NAACP LEGAL DEFENSE & EDUCATIONAL
FUND, INC.
700 14th Street NW, Suite 600
Washington, DC 20005
T: (202) 249-2193
mhumphrey@naacpldf.org
modunsi@naacpldf.org

Carol Garvan (N.H. Bar No. 21304)
Zachary L. Heiden*
Max Brooks*
AMERICAN CIVIL LIBERTIES UNION OF MAINE

Respectfully submitted,

/s/ Cody Wofsy

Cody Wofsy*
Hannah Steinberg*
Stephen Kang*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION IMMIGRANTS' RIGHTS PROJECT
425 California Street, Suite 700
San Francisco, CA 94104
T: (415) 343-0770
cwofsy@aclu.org
hsteinberg@aclu.org
skang@aclu.org

Grace Choi*
Noor Zafar*
Lee Gelernt*
Omar Jadwat*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION IMMIGRANTS' RIGHTS PROJECT
125 Broad St., 18th Floor
New York, NY 10004
T: (212) 549-2660
gchoi@aclu.org
nzafar@aclu.org
lgelernt@aclu.org
ojadwat@aclu.org

Lucia Goin**
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION IMMIGRANTS' RIGHTS PROJECT
915 15th Street NW
Washington, DC 20005
T: (332) 529-3732
lgoin@aclu.org

Norm Eisen*
Tianna Mays*
Taryn Wilgus Null*
DEMOCRACY DEFENDERS FUND
600 Pennsylvania Avenue SE, #15180
Washington, DC 20003
T: (202) 594-9958
norman@democracydefenders.org
tianna@democracydefenders.org

FOUNDATION
P.O. Box 7860
Portland, ME 04112
T: (207) 619-8687
cgarvan@aclumaine.org
heiden@aclumaine.org
mbrooks@aclumaine.org

Adriana Lafaille*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF MASSACHUSETTS, INC.
One Center Plaza Suite 850
Boston, MA 02108
T: (617) 482-3170
alafaille@aclum.org

taryn@democracydefenders.org

Kimberly Wei Leung*
Winifred Kao*
ASIAN LAW CAUCUS
55 Columbus Ave
San Francisco, CA 94111
T: (415) 896-1701
kimberlyl@asianlawcaucus.org
winifredk@asianlawcaucus.org

Counsel for Plaintiffs
**Admitted pro hac vice*
***Pro hac vice pending*