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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, *et. al.*,

Plaintiff,

v.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, *et. al.*,

Defendants.

Case No. 3:25-cv-1766-EMC

**DEFENDANTS' EMERGENCY MOTION TO
SHORTEN TIME**

Judge: Hon. Edward M. Chen

1 Defendants have filed an emergency motion to stay the Court’s March 31, 2025, order postponing
2 certain actions taken by Defendant Kristi Noem, Secretary of the Department of Homeland Security
3 (“DHS”). ECF Nos. 93, 95. Expedited briefing is necessary because the Court’s order prevents the
4 Secretary’s Vacatur of the 2025 Temporary Protected Status (TPS) for Venezuela and Termination of the
5 2023 TPS designation for Venezuela from taking effect on April 7, 2025. *Vacatur of 2025 TPS Decision*
6 *for Venez.*, 90 Fed. Reg. 8,805 (Feb. 3, 2025); *Termination of the October 3, 2023 Designation of Venez.*
7 *for TPS*, 90 Fed. Reg. 9,041 (Feb. 5, 2025); *see* Local Civ. R. 6-3(a)(1). Specifically, Defendants request
8 that the Court issue a decision on Defendants’ motion for a stay pending appeal no later than 3:00 p.m.
9 PDT on April 4, 2025. If the Court does not grant Defendants’ motion by then, Defendants intend to file
10 with the United States Court of Appeals for the Ninth Circuit a motion seeking a stay of the order
11 postponing Secretary Noem’s Vacatur and Termination of TPS for Venezuela.

1 Dated: April 1, 2025

Respectfully submitted,

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**[PROPOSED] ORDER GRANTING
MOTION TO SHORTEN TIME**

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3 Before the Court is the Defendants' motion to shorten time on a decision of their motion to stay
4 the Court's order postponing the vacatur of the former DHS Secretary's decision extending the 2023
5 Temporary Protected Status ("TPS") designation for Venezuela, and the subsequent termination of the
6 2023 TPS designation for Venezuela issued by Defendant Kristi Noem, Secretary of the Department of
7 Homeland Security. ECF Nos. 93, 95. Having reviewed the motion, and determined that further briefing
8 is warranted, IT IS HEREBY ORDERED that the motion is GRANTED.

9
10 Issued this ____ day of April, 2025.

Edward M. Chen
United States District Judge