

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

CITY OF CHICAGO and CITY OF SAINT PAUL,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF JUSTICE;  
PAMELA JO BONDI, in her official capacity;  
OFFICE OF COMMUNITY ORIENTED  
POLICING SERVICES; and CORY D.  
RANDOLPH, in his official capacity,

Defendants.

Civil Action No. 25-cv-13863

Hon. Jorge L. Alonso

**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION AND STAY OF AGENCY  
ACTION**

City of Chicago and City of Saint Paul (collectively, Plaintiffs) move the Court for a preliminary injunction pursuant to Federal Rule of Civil Procedure 65(a) and a stay of agency action pursuant to 5 U.S.C. § 705. For the reasons explained in Plaintiffs' Memorandum in Support of Motion for Preliminary Injunction and Stay of Agency Action, Plaintiffs seek the following injunctive relief, pending a final hearing and determination of the merits in this action:

1. An order preliminarily enjoining Defendants, their officers, agents, employees, attorneys, and all those in active concert or participation with Defendants, from:

- a. attaching, incorporating, imposing, or enforcing, or requiring Plaintiffs or their subrecipients to certify compliance with, the Discrimination Condition, the Executive Order Condition, the Immigration Condition, the Federal Funding Restrictions (collectively, as those conditions are defined

in the Complaint, the “Challenged Conditions”) or any materially similar terms or conditions, with respect to any applications submitted by Plaintiffs, and any DOJ funds awarded to or received by Plaintiffs or their subrecipients, whether directly or indirectly, including through new grant applications, applications for continuation funding, notices of funding availability or opportunity, certifications, grant agreements, post-award submissions, or reimbursement requests;

- b. attaching, incorporating, imposing, or enforcing the Civil Rights Conditions (as those conditions are defined in the Complaint), to the extent that Defendants construe any of the Civil Rights Conditions to require anything other than compliance with the statutes cited in the Civil Rights Conditions as they have been enacted by Congress and interpreted by the Judiciary; and
- c. rescinding, withholding, cancelling, or otherwise not processing any DOJ grant agreements, or pausing, freezing, impeding, blocking, cancelling, terminating, delaying, withholding, or conditioning DOJ funds based on such terms or conditions, including without limitation failing or refusing to process and otherwise implement grants signed with changes or other objections to conditions enjoined by this preliminary injunction.

2. An order pursuant to 5 U.S.C. § 705 postponing the effective date of any action by any Defendants, their officers, agents, employees, attorneys, and all those in active concert or participation with Defendants, to adopt, issue, or enforce the Challenged Conditions pending conclusion of this litigation.

3. An order requiring Defendants, their officers, agents, employees, attorneys, and all those in active concert or participation with Defendants, to immediately treat any actions taken to implement or enforce the Challenged Conditions or any materially similar terms or conditions as to Plaintiffs or their subrecipients, including but not limited to any delays or withholding of funds based on such conditions, as null, void, and rescinded; requiring Defendants, their officers, agents, employees, attorneys, and all those in active concert or participation with Defendants, to treat as null and void, while this preliminary injunction is in effect, any such conditions included in any grant agreement executed by Plaintiffs or their subrecipients; and forbidding the retroactive application of such conditions to grant agreements during the effective period of this preliminary injunction;

4. An order preliminarily enjoining Defendants, their officers, agents, employees, attorneys, and all those in active concert or participation with Defendants, from retaliating against any Plaintiff for participating in this lawsuit or taking any adverse action based on any Plaintiff's participation in this lawsuit, including reducing the amount of a grant award to that Plaintiff or to any state agency through which that Plaintiff may receive grant funding; refusing to issue, process, sign, or approve grant applications, grant agreements, or subgrant agreements; and refusing to issue, process, sign, or approve any invoice or request for payment, or reducing the amount of such approval or payment;

5. An order requiring Defendants' counsel to provide written notice of the aforementioned Order(s) to all Defendants and their officers, agents, servants, employees, and attorneys, and any other persons who are in active concert or participation with them by the end of the second day after issuance of said Order(s);

6. An order requiring Defendants, by the end of the second day after issuance of the aforementioned Order(s), to file on the Court's electronic docket and serve upon Plaintiffs a Status Report documenting the actions that they have taken to comply with said Order(s), including a copy of the notice and an explanation as to whom the notice was sent; and

7. Any other relief that this Court deems proper and just.

Dated: November 17, 2025

Respectfully submitted,

MARY B. RICHARDSON-LOWRY  
Corporation Counsel of the City of Chicago

By: /s/ Stephen Kane  
Stephen Kane (IL Bar No. 6272490)  
Rebecca Hirsch (IL Bar No. 6279592)  
Chelsey Metcalf (IL Bar No. 6337233)  
Laura Geary (IL Bar No. 6351762)  
City of Chicago Department of Law  
121 North LaSalle Street, Room 600  
Chicago, Illinois 60602  
Tel: (313) 744-9484  
stephen.kane@cityofchicago.org  
rebecca.hirsch2@cityofchicago.org  
chelsey.metcalf@cityofchicago.org  
laura.geary@cityofchicago.org

*Attorneys for Plaintiff City of Chicago*

LYNDSEY OLSON  
Saint Paul City Attorney

By: /s/ Kelsey McElveen  
KELSEY MCELVEEN \*  
Assistant City Attorney  
SAINT PAUL CITY ATTORNEY'S OFFICE  
400 City Hall and Courthouse  
15 Kellogg Boulevard West  
Saint Paul, Minnesota 55102  
Telephone: (651) 266-8710  
Facsimile: (651) 298-5619  
E-Mail: Kelsey.McElveen@ci.stpaul.mn.us

*Attorneys for Plaintiff City of Saint Paul*

\* Admitted pro hac vice