

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

IMMIGRANT ADVOCATES RESPONSE
COLLABORATIVE, et al.,
Plaintiffs,

vs.

UNITED STATES DEPARTMENT OF
JUSTICE, et al.,
Defendants.

Case No. 25-cv-2279
Hon. Trevor N. McFadden

**PLAINTIFFS' OPPOSED MOTION TO EXPEDITE PRODUCTION OF THE
ADMINISTRATIVE RECORD**

Plaintiffs Immigrant Advocates Response Collaborative, American Gateways, and the twelve individual plaintiffs respectfully move for an order expediting the schedule for production of the administrative record. Specifically, for the reasons presented in the accompanying memorandum in support of this motion, Plaintiffs respectfully request that the Court modify the default production schedule specified in LCvR 7(n) and instead require that the administrative record be produced by August 15, 2025.

Pursuant to LCvR 7(m), counsel for the Plaintiffs has conferred with counsel for the Defendants and reports that this motion is opposed.

Dated: July 24, 2025

Respectfully Submitted,

/s/ Elena Goldstein

Keren Zwick (D.D.C. Bar. No. IL0055)
Mark Fleming**
Mark Feldman***
Mary Georgevich**
Colleen Cowgill**
National Immigrant Justice Center
111 W. Jackson Blvd., Suite 800
Chicago, IL 60604
T: 312-660-1370
kzwick@immigrantjustice.org
mfleming@immigrantjustice.org
mfeldman@immigrantjustice.org
mgeorgevich@immigrantjustice.org
ccowgill@immigrantjustice.org

Elena Goldstein (D.C. Bar No. 90034087)
Jeffrey B. Dubner (D.C. Bar No. 1013399)
Joshua M. Salzman (D.C. Bar No. 982239)**,

Simon C. Brewer (Conn. Bar No. 441889)*. ***
Democracy Forward Foundation
P.O. Box 34553
Washington, DC 20043
T: (202) 448-9090
egoldstein@democracyforward.org
jdubner@democracyforward.org
jsalzman@democracyforward.org
sbrewer@democracyforward.org

Jordan Wells** (Cal. Bar No. 326491)
Victoria Petty** (Cal. Bar No. 338689)
Lawyers' Committee for Civil Rights of the
San Francisco Bay Area
131 Steuart Street # 400
San Francisco, CA 94105
T: (415) 543-9444
jwells@lccrsf.org
vpetty@lccrsf.org

Richard Caldarone (D.C. Bar No. 989575)
Refugee & Immigrant Center for Education
& Legal Services (RAICES)
P.O. Bo. 786100
San Antonio, TX 78278
T: (210) 960-3206
richard.caldarone@raicestexas.org

*Not admitted in D.C.; practicing under the supervision of Democracy Forward lawyers who are members of the D.C. Bar.

** Application for pro bono or pro hac vice admission pending or forthcoming.

*** Application for admission to D.D.C. pending.