UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

COALITION FOR INDEPENDENT TECHNOLOGY RESEARCH,

Plaintiff,

v.

MARCO RUBIO, in his official capacity as Secretary of State; KRISTI NOEM, in her official capacity as Secretary of Homeland Security; and PAMELA BONDI, in her official capacity as Attorney General of the United States,

Defendants.

Civil Action No. 1:26-cv-00815 (JEB)

[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR SECTION 705 STAY AND PRELIMINARY INJUNCTION

The Court, on consideration of Plaintiff's Motion for Section 705 Stay and Preliminary Injunction, along with accompanying memorandum, declarations, and exhibits, and any opposition, reply, and further pleadings and argument thereto, has determined that Plaintiff is likely to succeed on the merits of its claims that the Censorship Policy—Defendants' policy of excluding and deporting noncitizens based on their work involving misinformation, disinformation, fact-checking, content moderation, trust and safety, or compliance—violates the First Amendment, the Fifth Amendment, and the Administrative Procedure Act; that Plaintiff will suffer irreparable injury in the absence of injunctive relief; and that the balance of the equities and public interest favor preliminary relief.

It is therefore **ORDERED** that Plaintiff's Motion for Section 705 Stay and Preliminary Injunction is **GRANTED**. The Censorship Policy is **STAYED** pursuant to 5 U.S.C. § 705 and Defendants are preliminarily **ENJOINED** from enforcing it on pain of contempt.

It is further **ORDERED** that Plaintiff shall not be required to furnish security for costs.

SO ORDERED

Dated: _____

THE HONORABLE JAMES E. BOASBERG
CHIEF JUDGE

LCvR 7(K) STATEMENT

Pursuant to Local Rule 7(k), below is a list of all parties entitled to be notified of this Proposed Order. No counsel has yet entered in any appearance(s) for the following parties.

Pamela Bondi, in her official capacity as Attorney General of the United States
950 Pennsylvania Avenue, NW
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Kristi Noem, in her official capacity as Secretary of Homeland Security
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Marco Rubio, in his official capacity as Secretary of State
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U.S. Attorney's Office for District of Columbia
Civil Process Clerk
601 D Street, NW
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