UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

GREATER BOSTON LEGAL SERVICES, et al., *Plaintiffs*, v. MARKWAYNE MULLIN, et al., *Defendants*.	C.A. No. 26-14869-ADB **ORAL ARGUMENT REQUESTED**

PLAINTIFFS' MOTION FOR A STAY OF AGENCY ACTION UNDER 5 U.S.C. § 705

Plaintiffs hereby move pursuant to 5 U.S.C. § 705 to stay the September 2026 policy of the United States Department of Homeland Security ("DHS") to no longer disclose the location of individuals with final orders of removal on the ICE Online Detainee Locator System or in response to inquiries from counsel or family members (the "ODLS Final Order Policy"). As grounds, Plaintiffs refer to the accompanying memorandum of law.

REQUEST FOR ORAL ARGUMENT

Plaintiffs respectfully request oral argument on the motion. *See* L.R. 7.1(d).

Dated: November 4, 2026

Respectfully Submitted,

/s/ Jennifer M. Herrmann

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Counsel for Plaintiffs

Local Rule 7.1 Certificate

I hereby certify that counsel for Plaintiffs conferred with the government's counsel at the U.S. Attorney's Office for the District of Massachusetts in a good faith effort to narrow or resolve the issues raised by this motion. Defendants oppose this motion.

Date: November 4, 2026

/s/ Jennifer M. Herrmann
Jennifer M. Herrmann

Certificate of Service

I hereby certify that this motion, as well as the accompanying proposed order, memorandum, and supporting declarations will be served on all registered participants through the Court's CM/ECF system. Additionally, I will email a copy of this motion and the accompanying proposed order, memorandum, and supporting declarations to the government's counsel at the U.S. Attorney's Office for the District of Massachusetts.

Date: November 4, 2026

/s/ Jennifer M. Herrmann
Jennifer M. Herrmann