

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS,  
FORT WORTH DIVISION**

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STATE OF TEXAS,

Plaintiff,

v.

JOSEPH R. BIDEN, JR., et al.,

Defendants.

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Civil Action No. 4:21-cv-00579-P

**MOTION FOR PRELIMINARY INJUNCTION**

The State of Texas respectfully moves this Court to preliminarily enjoin the Defendants' enforcement of the Order promulgated at 86 Fed. Reg. 9,942 (Feb. 17, 2021). The State of Texas respectfully moves this Court to preliminarily enjoin the Defendants' noncompliance with their own applicable public health regulations, as laid out in the brief accompanying this motion. Further, the State of Texas respectfully moves this Court to preliminarily enjoin the Defendants' failure to detain, quarantine, and test—under 8 U.S.C. § 1222(a)—all aliens arriving who could carry a communicable disease of public health significance before releasing them into the United States.

The Defendants' actions described above—both individually, and in combination—cause irreparable harm to the State of Texas. The accompanying brief in support of this motion explains why.

Respectfully submitted,

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Attorney General of Texas

BRENT WEBSTER  
First Assistant Attorney General

/s/ Aaron F. Reitz  
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**CERTIFICATE OF CONFERENCE**

I certify that, on June 23, 2021, I conferred with counsel for the Defendants regarding this Motion. The Defendants oppose this Motion.

/s/ Aaron F. Reitz  
AARON F. REITZ  
*Lead Counsel*

**CERTIFICATE OF SERVICE**

I certify that, on June 23, 2021, I served this Motion through CM/ECF upon the Defendants.

/s/ Aaron F. Reitz  
AARON F. REITZ  
*Lead Counsel*