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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
GREAT FALLS DIVISION**

Susan Webber and Jonathan St. Goddard,  Plaintiffs,  vs.  U.S. DEPARTMENT OF HOMELAND SECURITY, THE UNITED STATES OF AMERICA, and, in her official capacity, KRISTI NOEM,  Defendants.	Cause No. 4:25-cv-00026-JTJ  <b>MOTION FOR PRELIMINARY AND PERMANENT INJUNCTION</b>  <b>HEARING RESPECTFULLY REQUESTED</b>
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**MOTION FOR  
PRELIMINARY AND PERMANENT INJUNCTION**

Pursuant to F.R.Civ.Pro. 65(a) Plaintiffs Susan Webber and Jonathan St. Goddard ask the Court to enjoin: Sections 2(a), (b), (d), (f), (g), and (h) of Executive Order 14193 as amended; Section 14 of Proclamations 10896 and 10895; and, Sections 2, 3(a), (b), (c), (d), (e) and (f), Section 4 (a), (b), (c), and (d) of Executive Order on Reciprocal Tariffs issued April 2, 2025. The Orders are collectively referred to as the Canada Orders. The Canada Orders are invalid in their entirety, and this Court should enjoin them until such time as the Court can hold a hearing and consider the merits of the argument. This relief is requested due to the irreparable harm that the Plaintiffs are suffering and will continue to suffer as a result of the Orders.

The grounds for this motion are set forth in the attached brief, and its supporting declarations. Counsel has contacted the United States Attorney's office in Billings regarding this filing and copies are being mailed and emailed to that office.

A hearing is respectfully requested at the Court's soonest convenience.

DATED this 4<sup>th</sup> day of April, 2025.

TRANEL LAW FIRM P.C.

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Monica J. Tranel  
*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 4<sup>th</sup> day of April, 2025, I served true and accurate copies of the **PLAINTIFFS' OF MOTION FOR INJUNCTION AND IMMEDIATE HEARING** by the method(s) indicated below, addressed as follows:

1 - 2 U.S. Mail, Postage Prepaid  
\_\_\_\_\_ Federal Express, Billed to Sender  
\_\_\_\_\_ Hand Delivery  
\_\_\_\_\_ E-Mail

Kurt Alme  
District of Montana  
Billings Main Office  
2601 2nd Ave N.  
Suite 3200  
Billings, MT 59101

Regulatory Affairs Law Division  
Office of the General Counsel  
U.S. Department of Homeland Security  
245 Murray Lane, SWMail Stop 0485  
Washington, DC 20528-0485

Pursuant to F.R.C.P. 5 and L.R. 7.1, the United States Attorney for Montana was contacted regarding this motion and brief through email and telephone at the U.S. Attorney's office in Billings, Montana, at 406-576-1013, and via email at lindsey.crowder@usdoj.gov. The motion and brief are being served by U.S. Mail overnight delivery requested, and via email. Counsel left a telephone message at 3:30 p.m. on April 4, 2025 with the main office at the U.S. Attorney's office in Billings, MT, with notice of the filing.