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

_____	)	Civil Action No. 25-0418
LAS AMERICAS IMMIGRANT	)	
ADVOCACY CENTER, <i>et al.</i> ,	)	
	)	
	)	
Petitioners,	)	
	)	
v.	)	
	)	
KRISTI NOEM, Secretary of the U.S.	)	
Department of Homeland Security,	)	
<i>et al.</i> ,	)	
	)	
Defendants.	)	
_____	)	

**NOTICE REGARDING REMOVALS**

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Shortly after the government submitted its opposition to Petitioners' motion seeking a temporary restraining order, the Department of Homeland Security removed the 178 immigration detainees who were detained at the Naval Station Guantanamo Bay (NSGB) from NSGB. *See* Declaration of Juan Agudelo, Acting Field Office Director, Immigration and Customs Enforcement, at ¶ 6. Most of the detainees were removed for repatriation to Venezuela. *Id.* The final immigration detainee was transferred from NSGB for removal in the near future. *Id.* As of the time of this filing, there are no immigration detainees being held at NSGB. *Id.* at ¶ 7. The procedures for accessing counsel described in the government's opposition briefing, Gov't Opp. at 6-7, remain in place and will be available to immigration detainees transferred to NSGB from the continental United States. Agudelo Declaration at ¶ 9.

The completion of the removal operation eliminates any need for temporary injunctive relief. In particular, Petitioners are not likely to suffer irreparable harm absent a temporary restraining order. The removal also underscores that immigration detention at NSGB is intended for temporary staging and not for indefinite detention, as Petitioners have suggested in their filings. *See* Gov't Opp. at 11 (citing Declaration of Juan Agudelo, ECF 14-1, at ¶ 6). For the reasons explained in the government's opposition briefing, the procedures in place for counsel access are reasonable and consistent with that purpose, and within the Secretary of Homeland Security's statutory detention authority, *see* 8 U.S.C. §§ 1231(a)(6); 1225(b)(1)(B)(iii)(IV). The Court should therefore deny the request for emergency relief and allow the case to proceed on a non-expedited basis.

Dated: February 20, 2025

Respectfully submitted,

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By: /s/ Sarah Wilson

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**CERTIFICATE OF SERVICE**

I hereby certify that February 20, 2025, I electronically filed this notice with the Clerk of the Court for the United States Court of for the District of Columbia by using the CM/ECF system. Counsel in the case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

By: /s/ Sarah Wilson  
SARAH WILSON  
United States Department of Justice