

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

J.G.G., *et al.*,

Plaintiffs-Petitioners,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States,
et al.,

Defendants-Respondents.

Civil Action No. 1:25-cv-00766

NOTICE TO THE COURT

For the reasons explained on the record, Federal Defendants object to this Court’s assertion of jurisdiction, including over the President’s exercise of powers vested in him by Article II. Subject to that objection, Federal Defendants were promptly notified of the Court’s temporary restraining order issued in the morning and the 7:26 PM EDT minute order that temporarily enjoined any removals pursuant to the Presidential Proclamation. Federal Defendants have sought emergency appellate relief from the D.C. Circuit as to both orders; the Court of Appeals has now ordered expedited briefing on both motions. The five individual Plaintiffs that were the subject of the first TRO have not been removed.

Going forward, and in the absence of appellate relief, Federal Defendants will continue to protect the United States using authorities other than the Proclamation. Federal Defendants further report, based on information from the Department of Homeland Security, that some gang members subject to removal under the Proclamation had already been removed from United States territory under the Proclamation before the issuance of this Court’s second order.

Respectfully Submitted,

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