

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

_____)	
J.G.G., <i>et al.</i> ,)	Civil Action No. 1:25-cv-00766
)	
Plaintiffs-Petitioners,)	
)	
v.)	
)	
DONALD J. TRUMP, in his official)	
capacity as President of the United States,)	
<i>et al.</i> ,)	
)	
Defendants-Respondents.)	
_____)	

NOTICE IN RESPONSE TO COURT ORDER

In yesterday’s 6:47 PM minute order, the Court ordered the Government to provide a sworn declaration on two points: the timing of the Proclamation and the fact that no individual removable under the Proclamation was removed from the United States after the Court’s order at 7:25 PM EDT on March 15, 2025. That declaration is attached. The declaration also addresses a third issue the Court inquired about: estimates as to the number of individuals subject to the Proclamation.

The Court also ordered the Government to address the form in which it can provide further details about flights that left the United States before 7:25 PM. The Government maintains that there is no justification to order the provision of additional information, and that doing so would be inappropriate, because even accepting Plaintiffs’ account of the facts, there was no violation of the Court’s written order (since the relevant flights left U.S. airspace, and so their occupants were “removed,” before the order issued), and the Court’s earlier oral statements were not independently enforceable as injunctions. The Government stands on those arguments. Moreover, given that the Government’s motion for a stay remains pending before the D.C. Circuit, the Government should not be required to disclose sensitive information bearing on national security and foreign relations

until that motion is resolved, especially given that this information is neither material nor time-sensitive. If, however, the Court nevertheless orders the Government to provide additional details, the Court should do so through an *in camera* and *ex parte* declaration, in order to protect sensitive information bearing on foreign relations.

Respectfully Submitted,

PAMELA J. BONDI
U.S. Attorney General

TODD BLANCHE
Deputy Attorney General

EMIL BOVE
Principal Associate Deputy
Attorney General

CHAD MIZELLE
Acting Associate Attorney General

ABHISHEK KAMBLI
Deputy Associate Attorney General

YAAKOV M. ROTH
Acting Assistant Attorney General

s/ Drew C. Ensign
DREW C. ENSIGN
Deputy Assistant Attorney General
950 Pennsylvania Avenue
Washington, DC 20530
Phone: (202) 514-2000
e-Mail: drew.c.ensign@usdoj.gov

AUGUST E. FLENTJE
Acting Director

EREZ REUVENI
Assistant Director

BRIAN C. WARD
Acting Assistant Director

CHRISTINA P. GREER
Senior Litigation Counsel

PATRICK GLEN
Senior Litigation Counsel