

**IN THE 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.

Case No: 1-25-00766

[PROPOSED] TEMPORARY RESTRAINING ORDER

Upon consideration of Plaintiffs-Petitioners’ Motion for a Temporary Restraining Order, and any opposition, reply, and further pleadings and argument thereto:

Having determined that Plaintiffs-Petitioners (“Plaintiffs”) are likely to succeed on the merits of their claims that the Alien Enemies Act, 50 U.S.C. § 21 *et seq.*, does not authorize the President to summarily remove them from the United States; that they have suffered violations of their rights under due process, the Immigration and Nationality Act, and statutes providing protection for those seeking humanitarian relief; that Plaintiffs will suffer irreparable injury in the absence of injunctive relief; and that the balance of hardships and public interest favor temporary relief, it is, therefore,

ORDERED that Plaintiffs’ Motion for a Temporary Restraining Order is hereby GRANTED; that the proposed class is provisionally certified; and that Defendants-Respondents (“Defendants”), their agents, representatives, and all persons or entities acting in concert with them are hereby:

1. ORDERED, pending further order of this Court, not to remove Plaintiffs, or any members of the putative class, from the United States pursuant to the Alien Enemies Act and any Proclamation invoking the Act;

2. ORDERED, pending further order of this Court, that insofar as any Plaintiffs, or any members of the putative class, are in the process of being removed or have already been removed from the United States pursuant to the Alien Enemies Act, but remain within the custody, control, and/or jurisdiction of the United States, such individuals shall be returned to the United States; and
3. ORDERED, pending further order of this Court, not to apprehend, restrain, secure, detain, or otherwise regulate Plaintiffs or any Members of the Putative Class, pursuant to the Alien Enemies Act.

It is further ORDERED that Plaintiffs shall not be required to furnish security for costs.

Entered on _____, 2025 at _____ a.m./p.m.

United States District Court Judge