

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

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

*Plaintiffs,*

v.

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

*Defendants.*

Case No: 1:25-cv-00766-JEB

**PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65, Plaintiffs hereby move for a preliminary injunction to enjoin Defendants from implementing the President's Proclamation, Invocation of the Alien Enemies Act Regarding the Invasion of the United States by Tren de Aragua (Mar. 15, 2025). Plaintiffs are a provisional class of all noncitizens in U.S. custody who are subject to the President's Proclamation and its implementation, and therefore at imminent risk of immediate, summary removal from the United States pursuant to the use of the Alien Enemies Act, 50 U.S.C. § 21 *et seq.*, against a non-state actor and outside the context of war for the first time in the country's history.

As further explained in the accompanying Memorandum, Defendants' invocation and application of the Alien Enemies Act patently violates the plain text of the statute and exceeds the limited authority granted to the Executive Branch by Congress. Defendants' invocation and application of the Alien Enemies Act also violates the Administrative Procedure Act, Immigration and Nationality Act, statutes obligating the government to provide the opportunity for people to

apply for humanitarian relief in the United States, and due process. Plaintiffs will suffer severe and irreparable harm in the absence of a preliminary injunction, as demonstrated by class members who have already been removed and consigned to a life sentence in a Salvadoran prison without ever have notice or the opportunity to contest the government's designation.

In support of this Motion, Plaintiffs rely on the accompanying Memorandum and declarations. A proposed order is attached for the Court's convenience.

Plaintiffs' counsel contacted counsel for Defendants on March 28, 2025, who stated that they oppose this motion.

Dated: March 28, 2025

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 28, 2025, I electronically filed the foregoing document and attachments with the Clerk of the Court for the United States District Court for the District of Columbia by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated: March 28, 2025

Respectfully Submitted,

*/s/ Lee Gelernt*

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