

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION

Trish Mack, as next friend of V.M.L., a
minor,

Petitioner,

v.

Mellissa HARPER, *et al.*,

Respondents.

Case No: _____

PETITIONERS' EMERGENCY MOTION
FOR A TEMPORARY RESTRAINING ORDER

Pursuant to Federal Rule of Civil Procedure 65, Petitioner two-year-old U.S. citizen V.M.L. (“Petitioner” or “V.M.L.”), through Next Friend Trish Mack, respectfully requests that the Court issue an order requiring Respondents to immediately release Petitioner. In the alternative, Petitioner requests that the Court issue an order barring Respondents from transferring her outside this District. Petitioner’s motion is supported by the accompanying memorandum of law and exhibits.

As explained in the accompanying Memorandum of Law in Support of Motion for a Temporary Restraining Order, Petitioner is likely to succeed on her claims that Respondents, by detaining her without any legal basis, are violating her rights under the Fourth and Fifth Amendments of the U.S. Constitution. Petitioner’s continued detention irreparably harms her, and the balance of the equities and the public interest heavily favor relief.

For the reasons stated above and in the accompanying documents, Petitioner respectfully requests that this Court grant the motion for a temporary restraining order.

Dated: April 24, 2025

Respectfully submitted,

/s/ Matthew Vogel
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**Pro hac vice application forthcoming*

COUNSEL FOR PETITIONERS

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on April 24, 2025, I uploaded the foregoing, along with all attachments thereto, to this Court's CM/ECF system.

/s/ Matthew Vogel