

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND  
GREENBELT DIVISION

KILMAR ARMANDO ABREGO GARCIA,

Petitioner,

v.

KRISTI NOEM, ET AL.,

Respondents.

Case No. 8:25-CV-02780-PX

**RESPONDENTS' UNOPPOSED  
RENEWED MOTION FOR LEAVE TO  
TRANSPORT PETITIONER TO THE  
U.S. DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
FOR A TEMPORARY PERIOD**

Respondents hereby move the Court for a renewed leave to transport Petitioner Kilmar Armando Abrego to the U.S. District Court for the Middle District of Tennessee for the limited purpose of attending a motions hearing on December 8 and 9, 2025, in his criminal case. Petitioner, through counsel, does not oppose this request.

On August 27, 2025, this Court granted Petitioner, Kilmar Armando Abrego Garcia, a preliminary injunction barring Defendants, members of the United States government from lawfully removing the Petitioner outside of the continental United States and requiring that the Immigration and Customs Enforcement maintain his detention within a 200-mile radius of Greenbelt, Maryland. ECF No. 20 (“Order”). At the status conference on August 27, 2025, the Court provided “[i]f anything changes”, the parties may seek amendments or reconsideration by separate motion. See ECF 24 at 15. Consistent with the Court’s Order, Petitioner has been detained at the Moshannon Valley Processing Center located in Phillipsburg, Pennsylvania (151 physical miles from Greenbelt, Maryland).

On October 16, 2025, Judge Waverly D. Crenshaw, Jr. of the U.S. District Court for the Middle District of Tennessee set an evidentiary hearing for November 4-5, 2025, regarding the parties’ pretrial motions in the Petitioner’s criminal case. See *U.S. v. Abrego Carcia*, 3:25-cr-115, ECF 167. Respondents, in turn, filed a Motion for Leave to Transport the Petitioner to Nashville,

Tennessee, for a temporary period of time on October 30, 2025. ECF No. 68. This court granted that motion on the same day. ECF No. 70. However, that hearing was reset to December 8-9, 2025, and as such, the Petitioner was never moved. *See Abrego Carcia*, 3:25-cr-115, ECF 205.

Nevertheless, the government has once again agreed to make Petitioner available for the upcoming hearing in Nashville, Tennessee. Nashville is located 577 physical miles from Greenbelt, Maryland. Accordingly, consistent with the Court's intent to facilitate Petitioner's access to counsel for both his civil and criminal proceedings, Respondents hereby renew their request for leave of court to transport Petitioner outside of the 200-mile radius required by the Court's August 27 Order, for the limited purpose of allowing Petitioner to be physically present for the evidentiary hearing set for December 8-9. Once the hearing is completed, Respondents will take appropriate steps to return Petitioner to a detention facility with the Court's prescribed 200-mile radius.

Dated: December 3, 2025

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 3, 2025, I electronically filed the foregoing document with the Clerk of the Court for the United States Court of Appeals for the Fourth Circuit by using the appellate CM/ECF system. Participants in the case are registered CM/ECF users, and service will be accomplished by the appellate CM/ECF system.

*/s/ Shane A. Young*  
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