

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

MOMODOU TAAL,

Plaintiff-Petitioner,

MÛKOMA WA NGÛGĨ, and SRIRAM
PARASURAMA,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States; U.S.
DEPARTMENT OF STATE; MARCO RUBIO, in
his official capacity as Secretary of the U.S.
Department of State; PAMELA BONDI, in her
official capacity as Attorney General, U.S.
Department of Justice; U.S. DEPARTMENT OF
HOMELAND SECURITY; KRISTI NOEM, in her
official capacity as Secretary of the U.S.
Department of Homeland Security; TODD M.
LYONS, in his official capacity as Acting Director,
U.S. Immigration and Customs Enforcement; and
THOMAS BROPHY, in his official capacity as
Field Office Director of the Buffalo Immigration
and Customs Enforcement Office,

Defendant-Respondents.

**MOTION FOR
TEMPORARY
RESTRAINING ORDER**

Civil Action No. 3:25-CV-
00335-ECC-ML

PLEASE TAKE NOTICE that, upon the Amended Complaint and the exhibits attached thereto, ECF 38, the accompanying memorandum of law, and all other pleadings and proceedings in this action, Plaintiffs, by and through undersigned counsel, submit this motion for a Temporary Restraining Order to enjoin Defendants Donald Trump, the Department of Homeland Security (“DHS”) and DHS Secretary Kristi Noem from attempting to detain or remove Mr. Taal from this Court’s jurisdiction, and to grant any other relief that the Court deems just and proper.

Date: March 27, 2025

Respectfully submitted,

s/ Eric Lee

Eric Lee, MI Bar No. P80058
24225 W 9 Mile Rd., Suite 140
Southfield, MI 48033
(248) 602-0936
ca.ericlee@gmail.com

Chris Godshall-Bennett, DC Bar No. 1780920
American-Arab Anti-Discrimination Committee (ADC)
910 17th St. NW, Suite 1000
Washington, D.C. 20006
(202) 465-4247
cgb@adc.org

Mohammad A. Saleem
Davis Ndanusa Ikhlas & Saleem LLP
26 Court Street - Suite 603
Brooklyn, NY 11242
646-812-7434
Email: msaleem@dnislaw.com

Maria Kari, TX Bar No. 24127161*
Project TAHA
5300 N Braeswood Blvd., Suite 4-191
Houston, TX 77096
(205) 862-8005
info@mariakari.org

Jonathan Wallace, NY Bar No. 1733757
P.O. Box 728
Amagansett, NY 11930
(917) 359-6234
jonathan.wallace80@gmail.com

Counsel for Plaintiffs

**pro hac vice* application filed