

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

LIYANARA SANCHEZ, as next friend on behalf of
FRENGEL REYES MOTA, *et al.*,

Petitioners–Plaintiffs,

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

Plaintiffs,

v.

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

Respondents–Defendants.

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

PETITIONERS-PLAINTIFFS’
MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65, Petitioners-Plaintiffs (“Petitioners”) hereby move for a preliminary injunction to prevent further harm to Petitioners and two subclasses who are already facing or imminently face grave and irreparable harm from the government’s unlawful use of the Alien Enemies Act to summarily expel individuals from the United States and imprison them in El Salvador.

First, for the CECOT subclass, Petitioners move for an Order requiring Respondents to immediately request and take all reasonable steps to facilitate the return of the subclass to the United States from Respondents’ jailer in El Salvador. This includes immediately requesting that Respondents’ agents and contractors in El Salvador, including any counterparty to an agreement

or contract concerning detention at CECOT, transfer the CECOT Subclass to the physical custody of the United States. It further includes enjoining payment of Respondents' agents and contractors in El Salvador, including any counterparty to an agreement or contract concerning detention at CECOT, to detain the CECOT subclass.

Second, for the Criminal Custody Subclass, Petitioners seek an Order enjoining Respondents from removing any subclass member from the United States under the President's Proclamation, and requiring Respondents to provide adequate notice of designation to each subclass member and class counsel, and a reasonable opportunity to challenge their designation, detention, and removal under the AEA, consistent with due process. Petitioners also seek an Order providing for immediate, adequate notice of designation to each member of the Criminal Custody Subclass and class counsel, including no less than 30 days to challenge their designation, detention, and removal under the AEA.

As further explained in the accompany Memorandum, Respondents' invocation and application of the AEA is unlawful and Petitioners will suffer—and, as to the CECOT class, have already suffered—severe and irreparable harm in the absence of a preliminary injunction in the form of an indefinite sentence in a Salvadoran prison without adequate notice and opportunity to contest the government's designation.

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

Dated: April 24, 2025

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Respectfully submitted,

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