

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

W.M.M., A.R.P., and F.G.M., *et al.*,

Petitioners–Plaintiffs,

v.

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

Respondents–Defendants.

Case No. 1:25-cv-59-H

STIPULATION

The parties have met and conferred, and the parties stipulate to the following factual findings:

A designation notice was prepared and given to FGM. Petitioners attach the version, redacted for the public docket, that FGM provided to attorneys from the ACLU of Texas on April 18 when they visited the Bluebonnet Detention Facility. Due to a litigation hold, the certificate of service was not executed. ICE did not read or translate the notice to FGM and did not sign the certificate of service on FGM’s notice.

In response to a further question from the Court, regarding Respondents’ representation in their Opposition to Class Certification that “the named Petitioners are all currently detained for removal proceedings consistent with the INA under processes and procedures that are not at issue in this case” (ECF No. 49 at 8), and requesting whether Respondents have decided not to remove

or attempt to remove the named plaintiffs, including F.G.M., under any circumstances, pursuant to the Alien Enemies Act, Respondents answer as follows:

Defendants are not prepared to represent that the named plaintiffs, including F.G.M., will not under any circumstances be removed pursuant to the Alien Enemies Act (AEA). The named petitioners will not be removed pursuant to the AEA while their habeas petition is pending.

Dated: April 30, 2025

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Respectfully submitted,

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**NOTICE AND WARRANT OF APPREHENSION AND REMOVAL
UNDER THE ALIEN ENEMIES ACT**

A-File No: _____ Date: 4/17/2025
 In the Matter of: G [REDACTED] M [REDACTED] F [REDACTED] A [REDACTED]
 Date of Birth: [REDACTED] 2002 Sex: Male ☒ Female ☐

Warrant of Apprehension and Removal

To any authorized law enforcement officer:

The President has found that Tren de Aragua is perpetrating, attempting, or threatening an invasion or predatory incursion against the territory of the United States, and that Tren de Aragua members are thus Alien Enemies removable under Title 50, United States Code, Section 21.

G [REDACTED] M [REDACTED] F [REDACTED] A [REDACTED] has been determined to be: (1) at least fourteen years of age; (2) not a citizen or lawful permanent resident of the United States; (3) a citizen of Venezuela; and (4) a member of Tren de Aragua. Accordingly, he or she has been determined to be an Alien Enemy and, under Title 50, United States Code, Section 21, he or she shall be apprehended, restrained, and removed from the United States pursuant to this Warrant of Apprehension and Removal.

Signature of Supervisory Officer: _____

Title of Officer: (A) FOO

Date: 4-17-2025

Notice to Alien Enemy

I am a law enforcement officer authorized to apprehend, restrain, and remove Alien Enemies. You have been determined to be at least fourteen years of age; not a citizen or lawful permanent resident of the United States; a citizen of Venezuela; and a member of Tren de Aragua. Accordingly, under the Alien Enemies Act, you have been determined to be an Alien Enemy subject to apprehension, restraint, and removal from the United States. Until you are removed from the United States, you will be detained under Title 50, United States Code, Section 21. Any statement you make now or while you are in custody may be used against you in any administrative or criminal proceeding. This is not a removal under the Immigration and Nationality Act. If you desire to make a phone call, you will be permitted to do so.

After being removed from the United States, you must request and obtain permission from the Secretary of Homeland Security to enter or attempt to enter the United States at any time. Should you enter or attempt to enter the United States without receiving such permission, you will be subject to immediate removal and may be subject to criminal prosecution and imprisonment.

Signature of alien: _____ **Date:** _____

CERTIFICATE OF SERVICE

I personally served a copy of this Notice and Warrant upon the above-named person on _____ (Date)
 and ensured it was read to this person in a language he or she understands.

 Name of officer/agent

 Signature of officer/agent

Form AEA-21B