

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

LAS AMERICAS IMMIGRANT ADVOCACY
CENTER, *et al.*,

Plaintiffs–Petitioners,

v.

KRISTI NOEM, Secretary of the U.S. Department of
Homeland Security, in her official capacity, *et al.*,

Defendants–Respondents.

Case No: 1:25-cv-00418

APPLICATION FOR A TEMPORARY RESTRAINING ORDER

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiffs-Petitioners Las Americas Immigrant Advocacy Center, Refugee and Immigrant Center for Education and Legal Services, American Gateways, Americans for Immigrant Justice, Eucaris Carolina Gomez Lugo, as next friend on behalf of Tilso Ramon Gomez Lugo, Angela Carolina Sequera, as next friend on behalf of Yoiker David Sequera, and Yajaira Del Carmen Castillo Rivera, as next friend on behalf of Luis Alberto Castillo Rivera (collectively, “Plaintiffs”), hereby apply for a temporary restraining order against Defendants-Respondents U.S. Department of Homeland Security (“DHS”), DHS Secretary Kristi Noem, Immigration and Customs Enforcement (“ICE”), Acting ICE Director Caleb Vitello, U.S. Department of Defense (“DOD”), DOD Secretary Pete Hegseth, the U.S. Department of State (“DOS”), and DOS Secretary Marco Rubio (collectively, “Defendants”).

Plaintiffs include civil immigration detainees who have been transferred to Guantánamo Bay Naval Station, and legal service organizations that provide essential representation to

detained immigrants. Immigrant detainees at Guantánamo have been denied the ability to communicate with counsel, placing them at immediate risk of harm, including the inability to seek legal relief, challenge their transfer or detention, or advocate for humane conditions.

As set forth in the accompanying Memorandum of Law, Defendants' restrictions on attorney-client communication violates Plaintiffs' right to habeas corpus, rights under the First Amendment and Fifth Amendment, and the Immigration and Nationality Act. Furthermore, the continued incommunicado detention of immigrants at Guantánamo creates an imminent and irreparable risk of harm, necessitating immediate judicial intervention.

In support of this Motion, Plaintiffs rely upon the accompanying Memorandum and declarations. A proposed order is attached for the Court's convenience. Plaintiffs respectfully request that this Court grant this emergency application and issue a temporary restraining order.

Dated: February 12, 2025

Respectfully submitted,

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**Pro bono representation certificates or Pro hac
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