

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

G.M.G.,

*Petitioner–Plaintiff,*

v.

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

*Respondents–Defendants.*

Case No. 1:25-cv-195-MRD-PAS

**NOTICE OF SUPPLEMENTAL AUTHORITIES**

Petitioner respectfully submits memorandum opinions, issued yesterday, from the U.S. District Court for the Southern District of New York and the U.S. District Court for the District of Colorado granting Petitioners’ Motions for Preliminary Injunctions. *See G.F.F. v. Trump*, No. 1:25-cv-2886-AKH (S.D.N.Y. May 6, 2025), ECF No. 84; *D.B.U. v. Trump*, No. 1:25-cv-1163-CNS (D. Colo. May 6, 2025), ECF No. 52. In *G.F.F.*, Judge Hellerstein concluded that the Presidential Proclamation did not satisfy the criteria of the Alien Enemies Act, and also that the government’s notice protocols violated the Act and due process. ECF No. 84 at 9–19. In *D.B.U.*, Judge Sweeney concluded petitioners who had not yet been designated under the Alien Enemies Act nevertheless had standing for their habeas petition, and likewise held that the Presidential Proclamation did not satisfy the predicates of the Alien Enemies Act. ECF No. 52 at 4–6, 13–19.

Dated: May 7, 2025

/s/ Sonja L. Deyoe

Sonja L. Deyoe (#6301)  
Cooperating Counsel,  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION OF RHODE ISLAND  
395 Smith Street  
Providence, RI 02908  
(401) 864-5877  
SLD@the-straight-shooter.com

Lynette Labinger (#1645)  
Cooperating Counsel,  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION OF RHODE ISLAND  
128 Dorrance Street, Box 710  
Providence, RI 02903  
(401) 465-9565  
LL@labingerlaw.com

Respectfully submitted,

/s/ My Khanh Ngo

My Khanh Ngo\*  
AMERICAN CIVIL LIBERTIES  
UNION FOUNDATION  
425 California Street, Suite 700  
San Francisco, CA 94104  
T: (415) 343-0770  
E: mngo@aclu.org

Lee Gelernt\*  
Daniel Galindo\*  
AMERICAN CIVIL LIBERTIES  
UNION FOUNDATION  
125 Broad Street, 18th Floor  
New York, NY 10004  
T: (212) 549-2660  
E: lgelernt@aclu.org  
E: dgalindo@aclu.org

Attorneys for Petitioner-Plaintiff

*\*Appearing pro hac vice*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 7, 2025, a true and correct copy of the foregoing Notice of Supplemental Authorities were electronically filed via the Court's CM/ECF system which sends notice of electronic filing to all counsel of record. I will provide copies of the foregoing via email to the U.S. Attorney's Office, District of Rhode Island to:

United States Attorney's Office  
District of Rhode Island  
Kevin Hubbard  
One Financial Plaza, 17th Floor  
Providence, RI 02903  
Kevin.Hubbard@USDOJ.gov  
401-709-5000

Dated: May 7, 2025

/s/ Sonja L. Deyoe