

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

L.G.M.L., et al.,

*Plaintiffs,*

v.

KRISTI NOEM, et al.,

*Defendants.*

Case No. 25-cv-2942-TJK

**PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65 and Local Rule 65.1, Plaintiff Children and putative class members hereby move for a preliminary injunction to enjoin Defendants from removing Guatemalan unaccompanied minors from the United States to Guatemala. The ten putative class representatives, like the rest of the Guatemalan unaccompanied minors in the custody of Office of Refugee Resettlement (ORR) were and continue to be at risk of removal to Guatemala without final orders of removal by an Immigration Judge. Many have expressed fear of return. Many have or had pending immigration cases in immigration court. Defendants' plans to remove them put them at risk of abuse, neglect, persecution, or torture in Guatemala.

As further explained in the accompanying Memorandum, Defendants' unlawful attempts to remove Guatemalan unaccompanied minors violate Section 235 of the William Wilberforce Trafficking Victims Protection Reauthorization Act ("TVPRA"), Pub. L. No. 110-457, 122 Stat. 5044 (2008), 8 U.S.C. § 1232; the Immigration and National Act ("INA"), 8 U.S.C 1101, *et seq.*; 45 C.F.R. 410.1000, *et seq.*; and the Fifth Amendment of the United States Constitution.

In support of this Motion, Plaintiff Children and putative class members rely on the accompanying Memorandum and evidence. A proposed order is attached for the Court's

convenience.

Dated: September 3, 2025

Respectfully submitted,

/s/ Efrén C. Olivares

Efrén C. Olivares\*  
Hilda Bonilla (D.C. Bar No. 90023968)  
Lynn Damiano Pearson\*\*  
Kevin Siegel\*\*  
NATIONAL IMMIGRATION LAW  
CENTER  
1101 14<sup>th</sup> Street, Suite 410  
Washington, D.C. 20005  
Tel: (213) 639-3900  
Fax: (213) 639-3911  
[bonilla@nilc.org](mailto:bonilla@nilc.org)  
[olivares@nilc.org](mailto:olivares@nilc.org)  
[damianopearson@nilc.org](mailto:damianopearson@nilc.org)  
[siegel@nilc.org](mailto:siegel@nilc.org)

*Counsel for Plaintiffs*

*\*Admitted pro hac vice*

*\*\*Pro hac vice application forthcoming*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 3, 2025, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the District of Columbia by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Efrén C. Olivares

Efrén C. Olivares  
Attorney for Plaintiffs