

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

Y.A.P.A.,

Petitioner–Plaintiff,

v.

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

Respondents–Defendants.

Case No. 4:25-cv-144-CDL-CHW

JOINT MOTION TO STAY PROCEEDINGS

On May 21, 2025, this Court entered a preliminary injunction barring Respondents from “remov[ing] Petitioner from the United States as an alien enemy” until “this Court has entered an order specifically setting forth the due process requirements necessary to protect Petitioner’s constitutional rights in light of the most recent Supreme Court opinions.” Dkt. 22 at 14–15. The preliminary injunction “only addresses the removal of Petitioner as an alien enemy pursuant to the Alien Enemies Act. It does not restrict the Government from removing Petitioner under other lawful authorities, including the transfer from Stewart [Detention Center] to effect his removal under the” Immigration and Nationality Act. *Id.* at 15 n.4.

The Parties hereby jointly request that all deadlines and all proceedings be stayed in this matter unless and until Respondents designate Petitioner as an “alien enemy” subject to the Alien Enemies Act. If such designation occurs, the Parties will jointly notify the Court and propose a briefing schedule on the issue of what process is appropriate.

Dated: June 26, 2025

Respectfully submitted,

/s/ Rebecca M. Cassler

Rebecca M. Cassler
GA Bar No. 487886
Michelle Lapointe
GA Bar No. 007080
American Immigration Council
PMB 2026
2001 L ST. NW, Ste. 500
Washington, DC 20036
T: 202-5007-7514
rcassler@immcouncil.org
mlapointe@immcouncil.org

Lee Gelernt (NY 2502532)*
Daniel Galindo (CA 292854)*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
125 Broad Street, 18th Floor
New York, NY 10004
T: (212) 549-2660
F: (212) 519-7871
E: lgelernt@aclu.org
E: dgalindo@aclu.org

My Khanh Ngo (CA 317817)*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
425 California Street, Suite 700
San Francisco, CA 94104
T: (415) 343-0770
F: (212) 519-7871
E: mngo@aclu.org

*Admitted pro hac vice

Counsel for Petitioner

WILLIAM R. KEYES
UNITED STATES ATTORNEY

BY: s/ Roger C. Grantham, Jr.
ROGER C. GRANTHAM, JR.
Assistant United States Attorney
Georgia Bar No. 860338
United States Attorney's Office
Middle District of Georgia
P. O. Box 2568
Columbus, Georgia 31902
Phone: (706) 649-7728
roger.grantham@usdoj.gov

Attorney for the United States