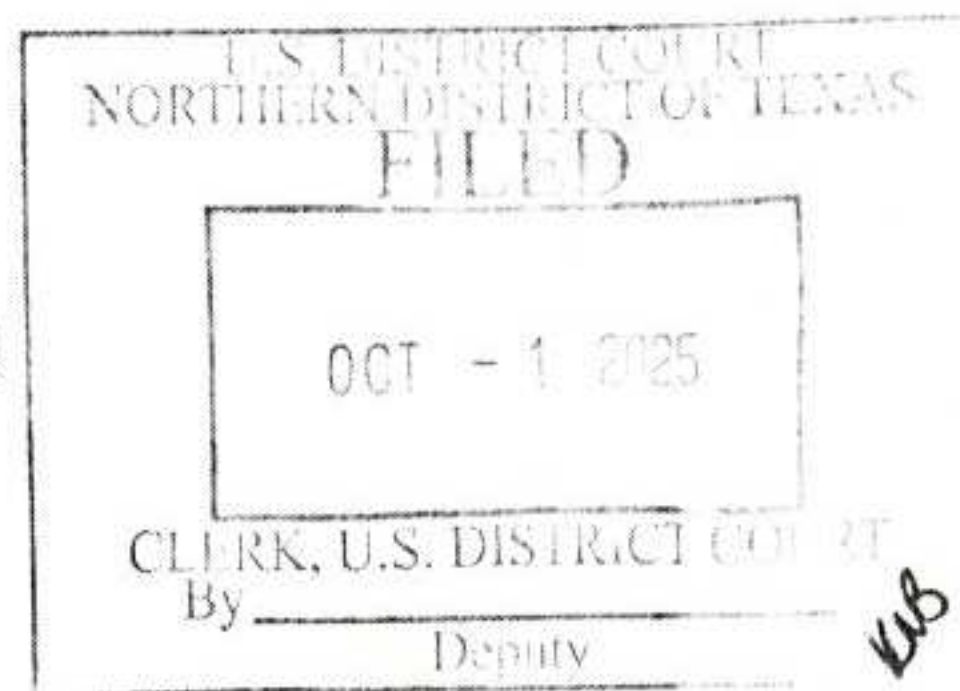


Case No. 3:25-cv-01700-K-BN

Emergency Motion for Temporary Restraining Order (TRO)  
in the matter of Liubov Kokoreva (A# [REDACTED])



Petitioner:

Liubov Kokoreva (A# [REDACTED]), citizen of Russia, currently held in ICE custody at Richwood Correctional Center, Monroe, Louisiana.

### Grounds for the Motion

1. Petitioner has a pending **Petition for Writ of Habeas Corpus** (Case No. 3:25-cv-01700-K-BN), filed on May 15, 2025, which remains under review by this Court.
2. Despite the existence of this active judicial proceeding, ICE is taking steps to deport Petitioner, including her transfer with all belongings to Richwood Correctional Center for removal preparation.
3. Deportation of an individual while a habeas corpus petition is pending violates **28 U.S.C. § 2241** and undermines the constitutional right to judicial review of the legality of detention. Any ICE action to remove her would interfere with the jurisdiction of this Court.
4. Furthermore, Petitioner's husband, **Dmitrii Gukovskii** (A# [REDACTED]), has won his asylum case in Immigration Court (decision rendered in his favor). This decision will take effect on October 3, 2025, but the fact of a favorable judgment for her spouse already creates a direct right of Petitioner to **derivative asylum** under **INA § 208(b)(3)(A)**.
5. If ICE proceeds with deportation at this time, Petitioner will suffer irreparable harm:
  - it will violate the jurisdiction of the federal court,
  - deprive her of her right to derivative asylum,
  - and cause unlawful family separation.
6. Petitioner also draws the Court's attention to the fact that her case has not yet been formally entered into the EOIR system, which prevents consolidation with the case of her husband Dmitrii Gukovskii. We respectfully request that the Court take note of this and order ICE/EOIR to enter Petitioner's case into the system and consider consolidation with her spouse's case.

**Relief Requested**

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For the reasons stated above, Petitioner respectfully requests that this Court:

1. **Immediately issue a Temporary Restraining Order (TRO)** directing ICE and DHS to halt any actions related to the deportation of Liubov Kokoreva until full adjudication of her habeas corpus petition.
2. Require ICE to notify the Court of any actions related to the transfer or status change of Petitioner.
3. Order ICE and EOIR to enter Liubov Kokoreva's case into the judicial system and consider consolidation with her spouse's case, in which protection has already been granted.
4. If necessary, set this matter for an expedited hearing.

**Date:** September 27, 2025

**Sincerely,**

Galina Gukovskaya

(Next Friend under 28 U.S.C. § 2242, as Ms. Kokoreva is detained and unable to file directly)

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