
EMERGENCY PETITION FOR IMMEDIATE RELIEF / TEMPORARY RESTRAINING ORDER

I. BACKGROUND

On September 10, 2025, ICE attempted to deport Petitioner to Haiti while his BIA appeal was pending, ignoring his objection that the removal was unlawful. An officer stated: "If Haiti does not want you, we will send you to a third country." After being removed from the aircraft before takeoff, ICE confiscated his entire legal file and transferred him to Camp 57 Angola.

Petitioner remains subject to medical neglect and inhumane conditions. Because ICE retains his documents, he can attach only limited grievance forms as exhibits.

Page 16 of 22

II. LEGAL STANDARD AND ARGUMENT

Under Fed. R. Civ. P. 65(b), a temporary restraining order issues when (1) there is a likelihood of success on the merits, (2) irreparable harm, (3) the balance of equities favors relief, and (4) the public interest supports it. Nken v. Holder, 556 U.S. 418 (2009). Petitioner satisfies each criterion.

III. RELIEF REQUESTED

Petitioner asks the Court to:

- ❶ Issue an Emergency TRO barring his removal or transfer during this case;
- ❷ Order ICE to restore and produce his confiscated legal file; and
- ❸ Direct continuity of VA-prescribed medical and mental-health care.



Gardy Gregory Alexandre

A# [REDACTED] | ID: [REDACTED]

Date: October 14, 2025

[PROPOSED ORDER]

Upon consideration of Petitioner's Petition and Emergency Petition, the Court finds good cause for temporary relief.

IT IS ORDERED THAT:

- 1** Respondents shall refrain from removing or transferring Petitioner from this Court's jurisdiction while the petition is pending.
- 2** Respondents shall produce Petitioner's confiscated legal and medical files within 7 days.
- 3** Respondents shall ensure continuous VA-equivalent medical care.
- 4** The Court shall schedule an evidentiary hearing under 28 U.S.C. § 2243 within days.

SO ORDERED this day of 2025, at Baton Rouge, Louisiana.

UNITED STATES DISTRICT JUDGE

PROOF OF SERVICE

I, Gardy Gregory Alexandre, declare under penalty of perjury that on this ~~14th~~ day of October 2025, I mailed true copies of this filing to the following:

☒ Kevin Jordan – Warden, Camp 57 ICE Processing Center
17544 Tunica Trace, Angola LA 70712

☒ Pam Bondi – Attorney General of the United States
U.S. Department of Justice, 950 Pennsylvania Ave NW, Washington DC 20530

☒ Todd Lyons – Acting Director, ICE
500 12th Street SW, Washington DC 20536

☒ Kristi Noem – Secretary, DHS
2707 Martin Luther King Ave SE, Washington DC 20528

☒ Field Office Director – ICE Oakdale LA
1010 East Whatley Rd, Oakdale LA 71463

☒ Chief Counsel – OPLA New Orleans
423 Canal St, Suite 450, New Orleans LA 70130

☒ U.S. Attorney – Middle District of Louisiana
777 Florida St, Suite 208, Baton Rouge LA 70801

Executed this October 14, 2025 at Angola, Louisiana.



Gardy Gregory Alexandre

As  ID# 