

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

CHRISTIAN CABEZA RAMIREZ, *et al*,

Petitioners,

v.

JASON STREEVAL, Warden, Stewart Detention Center; LADEON FRANCIS, Field Office Director, Atlanta Field Office, United States Immigration and Customs Enforcement; TODD M. LYONS, Acting Director, United States Immigration and Customs Enforcement; MARKWAYNE MULLIN, Secretary of Homeland Security; TODD BLANCHE, Acting United States Attorney General, *in their official capacities,*

Respondents.

Civil Action No.: 4:26-cv-571-CDL-AGH

**RESPONSE TO RESPONDENTS' MOTION FOR CLARIFICATION AND
PETITIONER'S MOTION FOR TEMPORARY RESTRAINING ORDER**

In response to the Court's Order, Doc. 24, and Respondents' Motion for Clarification, Doc. 25, and to the extent not already covered by the Court's prior TROs, Petitioners file this renewed motion for a temporary restraining order ("TRO") or, in the alternative, a preliminary injunction ("PI"), enjoining Respondents from deporting Petitioners from the United States or removing them from this jurisdiction until the Court issues a final order on their habeas petitions.

In support of this motion, Petitioners rely on the arguments and allegations raised in their previous filings in this consolidated case. Additionally, a TRO and/or preliminary injunction barring removal and transfer is also warranted given the importance of maintaining the status quo. "The purpose of a TRO is to maintain the status quo until the Court can reach the final merits of

the suit.” *Missouri v. United States Dep't of Educ.*, No. CV 224-103, 2024 WL 4069224, at *2 (S.D. Ga. Sept. 5, 2024). Here, the Court issued TROs prohibiting the deportation of Petitioners for precisely that reason, “[t]o maintain the status quo and avoid the moot[ing] of Petitioner[s]’ claim[s].” Doc 3. The Court’s Order does not constitute a final ruling on the merits of the suit; it is simply a denial of release as preliminary relief. If the Government were to deport Petitioners before the Court issued a final ruling, the status quo would be disrupted, Petitioners’ claims would be mooted, and all meaningful relief would be foreclosed.

For the reasons above and those raised in Petitioners’ previous filings, the Court should continue to maintain the status quo and bar Respondents from removing Petitioners from the United States or from this District until it makes a final ruling on the underlying habeas claims, or clarify that its prior TROs already do so.

Dated: May 13, 2026

Respectfully submitted,



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