

**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

MOTION FOR CLARIFICATION AND TEMPORARY RESTRAINING ORDER

On May 14, 2026, undersigned counsel attempted to make an appointment for a virtual visit with Willender Jaciel Carmona Acuna, one of the consolidated petitioners in the above-captioned matter, and discovered that he was no longer at Stewart Detention Center. His family then informed counsel that Mr. Carmona Acuna had been moved to Arizona.

Counsel communicated this information to AUSA Morrill, who advised counsel that Respondents were “getting him back to Stewart.” *See* Ex. A, May 14 Emails. AUSA Morrill further stated, “I have directed ICE to, at least for now, consider all of the petitioners in the consolidated case as having TROs to prevent transfer or removal, so hopefully this won’t happen again.” *Id.* While undersigned counsel appreciate AUSA Morrill’s swift response, Respondents’ transfer of

Mr. Carmona Acuna demonstrates a need for further clarity and an additional order from the Court establishing the parameters of the TRO.

The Court's May 14, 2026 Order, ECF No. 27, states that "Petitioners shall not be removed, deported, and/or transferred from Stewart Detention Center until further order of this Court." Undersigned counsel believe it is clear that the Order applies to all Petitioners in the consolidated case. Respondents seem less clear. Because of the way the cases were consolidated, it appears that a TRO prohibiting removal explicitly issued in the individual matters of Mr. Cabeza-Ramirez, *see* ECF No. 3; Ms. Aponte-Reyes, *see* Case No. 4:26-cv-691, ECF No. 4; Mr. Diaz-Gonzalez, *see* Case No. 4:26, cv-692, ECF No. 4; and Mr. Liendo-Ruiz, *see* Case No. 4:26-cv-700, ECF No. 3. The remaining petitioners, whose cases were immediately consolidated into the instant matter, did not have individual TROs issued in their cases, and Respondents have cited that as a source of continuing confusion regarding whether the May 14 Order, ECF No. 27, applies to all Petitioners. *See* Ex. A.

Accordingly, Petitioners respectfully request that the Court clarify for Respondents that there is a TRO as to *all* current petitioners in the consolidated case, prohibiting their removal, deportation, or transfer from Stewart Detention Center.

Undersigned counsel also intend to file additional petitions into the consolidated case on behalf of other Venezuelan TPS holders detained at Stewart Detention Center. Petitioners therefore request that the Court's TRO extend to future petitioners in the consolidated case, similarly prohibiting their removal, deportation, or transfer from Stewart Detention Center.

Additionally, undersigned counsel request the Court issue a TRO ordering the immediate return of Mr. Carmona Acuna to Stewart. While Respondents have communicated they already

intend to return Mr. Carmona Acuna to Stewart, a court order directing them to do so and to do so immediately is warranted.

Dated: May 15, 2026

Respectfully submitted,

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