

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

LAS AMERICAS IMMIGRANT ADVOCACY
CENTER, *et al.*,

Plaintiffs–Petitioners,

v.

KRISTI NOEM, Secretary of the U.S. Department of
Homeland Security, in her official capacity, *et al.*,

Defendants–Respondents.

Case No: 1:25-cv-00418

[PROPOSED] TEMPORARY RESTRAINING ORDER

Upon consideration of the Plaintiffs-Petitioners' Motion for a temporary restraining order, and any opposition, reply, and further pleadings and argument thereto;

Having determined that Plaintiffs-Petitioners are likely to succeed on the merits of their claim that they have suffered a violation of their right to habeas corpus, and on their claims under the First Amendment, the Due Process Clause of the Fifth Amendment, and the Immigration and Nationality Act, that Plaintiffs-Petitioners will suffer irreparable injury in the absence of injunctive relief, and that the balance of hardships and public interest favor relief, it is, therefore,

ORDERED that Plaintiffs-Petitioners' Motion for Temporary Restraining Order is hereby GRANTED; and that Defendants-Respondents, their agents, representatives, and all persons or entities acting in concert with them are hereby:

1. ORDERED, pending further order of this Court, to provide Plaintiff–Petitioners with scheduled, timely, free, confidential, and unmonitored legal telephone and/or videoconference calls, with accommodations for interpretation;

2. ORDERED, pending further order of this court, to provide sufficient private, confidential in-person visitation spaces to conduct timely in-person legal visits, with access to confidential telephonic language interpretation;
3. ORDERED, pending further order of this court, to provide a method for immigrants detained at Guantánamo to place timely, free, confidential, and unmonitored outgoing legal calls;
4. ORDERED, pending further order of this court, to provide a method for timely and confidential document exchange, including communication via fax, email, or electronic signature platforms; courier service; and mail;
5. ORDERED, pending further order of this court, to make publicly available information regarding protocols for attorney–client communication at Guantánamo via in-person meeting, telephone, videoconference, fax, email, mail, and courier service, via Defendant Immigration and Customs Enforcement’s website, and be provided in English and Spanish to all immigrants detained by Defendants at Guantánamo;
6. ORDERED, pending further order of this court, to specifically identify the location of a detainee held at Guantánamo as “Guantánamo” in Defendant-Respondent Immigration and Customs Enforcement’s Online Detainee Locator System within 24 hours of their transfer to Guantánamo;
7. ORDERED, pending further order of this court, to provide all known counsel for immigrants detained in the United States with 72-hour notice of their clients’ planned transfer to Guantánamo;

8. ORDERED, pending further order of this court, to provide undersigned with 72-hour notice of any planned transfer from Guantánamo of a detainee to a country other the United States.

It is further ORDERED that Plaintiffs-Petitioners shall not be required to furnish security for costs.

Entered on _____, 2025 at _____ a.m./p.m.

United States District Court Judge