

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

W.J.C.C.

Petitioner-Plaintiff,

v.

DONALD J. TRUMP, *et al.*,

Respondents-Defendants.

No. 3:25-cv-00153-SLH

RESPONSE TO MINUTE ENTRY OF MAY 30, 2025

During the hearing on this matter held on May 30, 2025 and in the subsequent Minute Order of May 30, 2025, ECF 17, the Court directed the parties to submit proposed orders regarding how the case should move forward. Respondents' proposed order is attached hereto as Exhibit A.

Also during the hearing and in the Court's Minute Order, the Court indicated that "it would entertain suggestions regarding the language barring the movement of W.J.C.C. in any order that the Court issues in the future." ECF 17. Respondents therefore provide the following.

Respondents continue to maintain that the Court lacks any authority under Title 8 and/or Title 50 to bar Petitioner's transfer out of the Western District of Pennsylvania. ECF 13 pp.13-16. But, there is no dispute that proceedings under Title 8 (to which Petitioner is currently subject) are separate and distinct from proceedings under Title 50 (under which Petitioner has not been, and may never be, designated). Because of this distinction, and even though Respondents continue to maintain that the Court lacks authority to bar the transfer of Petitioner out of the District under either provision, Respondents request, to the extent the Court decides not to dissolve its TRO, that the Court modify its TRO Order (ECF 4) to permit Respondents to transfer Petitioner out of the Western District pursuant to Title 8.

Currently, the Court's May 22, 2025 Order provides:

"2) ORDERED, pending further order of this Court, not to transfer Petitioner from the Western District of Pennsylvania[.]" ECF 4.

Respondents propose that the Court modify this provision as follows:

ORDERED, pending further order of this Court, not to transfer Petitioner from the Western District of Pennsylvania except as pursuant to Title 8 of the United States Code.

Respectfully submitted this 2d day of June, 2025.

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