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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF TEXAS**

10
11 NOU XIONG next friend for V.L.; V.L., } Case No.: 4:25-cv-558
12 on his own behalf and on behalf of all }
13 others similarly situated } **PETITIONER-PLAINTIFF'S**
14 *Petitioner-Plaintiff,* } **AMENDED EMERGENCY MOTION**
15 vs. } **TO ENFORCE ORDER ECF 2**
16 DONALD J. TRUMP, in his official }
17 capacity as President of the United States, }
18 *et al.,* }
19 *Respondents-Defendants.* }

20 **OPPOSITION TO GOVERNMENT REQUEST AT ECF 11 TO MODIFY**
21 **RESTRAINING ORDER**

22 The Government is engaging in war powers without law backing it. Its citation
23 of the AEA is merely window dressing to put a law facially upon an unbounded
24 executive using war powers without congressional approval. These arguments are in
25 the pleadings and Petitioner does not waive them. The Government cited the AEA to
26 invoke nonexistent war powers (which do not depend upon the AEA for existence or
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28

1 administration), and now it asks this Court to use the AEA as a stop gap to allow the
2 very war powers it invoked using the AEA. This Court should deny the
3 Government's request and grant Petitioner's emergency motion to maintain venue to
4 hear this matter. It should not enable a clear violation of an order, and a clear attempt
5 at subterfuge.
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8 Petitioner's removal is not otherwise consistent with the law outside of the
9 AEA as the Government puts forth. It is a betrayal of a people who fought with the
10 United States in war on Memorial Day no less.
11

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13 Executed in Hollywood, California.
14

15 DATED: May 26, 2025
16

/s/ Joshua J. Schroeder

Joshua J. Schroeder

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Attorney for Nou Xiong next
friend of V.L., and V.L.