

Niels W. Frenzen (Calif. Bar No. 139064)
699 Exposition Blvd.
Los Angeles, CA 90089-0071
213-740-8933; 213-740-5502 (Fax)
nfrenzen@law.usc.edu

Eric Lee (Mich. Bar No, P80058)*
24225 W. 9 Mile Rd. Ste. 140
Southfield, MI 48033
248-602-0936
ca.ericlee@gmail.com
*Admission forthcoming

Pro Bono Counsel for Petitioner

**UNITED STATES DISTRICT COURT
DISTRICT OF COLORADO**

SUSANNA DVORTSIN,)	PETITIONER'S EX PARTE
As Next Friend of Hayam El Gamal, et al.,)	APPLICATION FOR
)	TEMPORARY RESTRAINING
<i>Petitioner,</i>)	ORDER AND ORDER TO
)	SHOW CAUSE
v.)	
)	
KRISTI NOEM,)	
in her official capacity as Secretary)	
of the Department of Homeland Security;)	
)	
)	
TODD LYONS,)	
in his official capacity as Acting)	
Director of Immigration and Customs)	
Enforcement; and)	
)	
)	
JOHN FABBRICATORE,)	
In his official capacity as ICE Denver)	
Field Office Director,)	
)	
<i>Respondents.</i>)	
)	

Pursuant to Rule 65(b) of the Federal Rules of Civil Procedure and D.C.COLO.LCivR 65.1(a), Petitioner Susanna Dvortsin, as next friend of Hayem El Gamal and her five children, hereby moves the Court for emergency relief in the form of a temporary restraining order directing that Respondents immediately release Ms. El Gamal and her children from their custody or, in the alternative, issue an emergency stay prohibiting Respondents from transferring Ms. El Gamal and her children from outside this District pending further Order of this Court.¹ Petitioner further moves for the issuance of an order to show cause as to why a preliminary injunction should not issue.

This application is supported by the Memorandum of Points and Authorities, accompanying exhibits, the records in this action, as well as any additional submissions that may be considered by the Court.

Dated: June 4, 2025

Respectfully submitted,

/s/ Niels W. Frenzen
NIELS W. FRENZEN
699 Exposition Blvd
Los Angeles, CA 90089-0071
Telephone: (213)740-8933
nfrenzen@law.usc.edu

Eric Lee (Mich. Bar No, P80058)*
24225 W. 9 Mile Rd. Ste. 140
Southfield, MI 48033
248-602-0936
ca.ericlee@gmail.com
**Admission forthcoming*

¹ A memorandum in support of this application is forthcoming.

Attorneys for Petitioner

CERTIFICATE OF COUNSEL

Pursuant to FRCP 65(b)(1) and D.C.COLO.LCivR 65.1(a)(2), I hereby certify that the pleadings in this matter are being finalized on June 3, 2025 at approximately 11:30 PM MT and that undersigned counsel has not been able to give advance notice of the filing of this Ex Parte Application due to the imminent hardship of possible removal faced by Ms. El Gamal and her children. Counsel will be emailing copies of the pleadings to Bishop.grewell@usdoj.gov.

Dated: June 4, 2025
(MT)

Respectfully submitted,

/s/ Niels W. Frenzen
NIELS W. FRENZEN
699 Exposition Blvd
Los Angeles, CA 90089-0071
Telephone: (213)740-8933
nfrenzen@law.usc.edu

Eric Lee (Mich. Bar No, P80058)*
24225 W. 9 Mile Rd. Ste. 140
Southfield, MI 48033
248-602-0936
ca.ericlee@gmail.com
**Admission forthcoming*

Attorneys for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on June 4, 2025 (MT), I caused the foregoing document to be electronically filed with the United States District Court, District of Colorado, by using the CM/ECF filing system. I further certify that all participants in this case are registered CM/ECF users and that service will be accomplished through the CM/ECF system.

Dated: June 4, 2025 (MT)

/s/ Niels W. Frenzen
NIELS W. FRENZEN
699 Exposition Blvd
Los Angeles, CA 90089-0071
Telephone: (213)740-8933
nfrenzen@law.usc.edu

Eric Lee (Mich. Bar No, P80058)*
24225 W. 9 Mile Rd. Ste. 140
Southfield, MI 48033
248-602-0936
ca.ericlee@gmail.com
Admission forthcoming