

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

LAFAYETTE DIVISION

FRICO JEAN) CIVIL ACTION NO. 25-cv-00970
)
VERSUS) JUDGE CAIN
)
BRYAN PATTERSON ET AL) MAGISTRATE JUDGE AYO
)

**FEDERAL RESPONDENTS' RESPONSE TO PETITIONER'S
MOTION FOR TEMPORARY RESTRAINING ORDER**

Petitioner, a native and citizen of Haiti, filed a habeas petition on July 8, 2025, alleging that he was in the custody of U.S. Immigration and Customs Enforcement (ICE) in Pine Prairie, LA and that he was granted Temporary Protected Status by the U.S. Citizenship and Immigration Services (USCIS), and therefore not subject to detention related to his status or removal. See ECF 1 at ¶¶ 1, 3-6. This Court ordered Federal Respondents to respond to the complaint within fourteen days of service. ECF 5. However, Petitioner then filed a motion for temporary restraining order (TRO) (ECF 7), for which the Court has set a telephonic hearing on today's date, July 16, 2025, at 9:30 a.m. *See* Court's Minute Entry, dated July 15, 2025.

Petitioner's motion for a TRO seeks to have the Court enjoin Federal Respondents from removing Petitioner to a new detention center, and from removing Petitioner from the United States until the conclusion of his habeas proceedings before the Court. ECF 7 at 2.

Based upon information and belief, Petitioner was moved from Pine Prairie to a staging facility in Alexandria, LA and was moved again for removal from the U.S.

However, the U.S. Attorney's Office has been advised by ICE that Petitioner will be returned to the Western District of Louisiana by this evening.

Thus, Federal Respondents request that the Court deny Petitioner's motion for TRO as moot or defer the matter to the merits of the Complaint and allow Federal Respondents to review Petitioner's Complaint and allegation of TPS and respond with fourteen days of service as originally ordered.

Respectfully submitted,

ALEXANDER C. VAN HOOK
Acting United States Attorney

BY: *s / Karen J. King*
KAREN J. KING (#23508)
Assistant United States Attorney
800 Lafayette Street, Suite 2200
Lafayette, Louisiana 70501
Telephone: (337) 262-6618
Facsimile: (337) 262-6693
Email: karen.king@usdoj.gov