

**UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

KOSTAK ,

Petitioner,

v.

TRUMP, et al.,

Respondents.

Civil Action No. 3:25-cv-01093

Judge Jerry Edwards, Jr.

**MOTION FOR TEMPORARY RESTRAINING ORDER AND TEMPORARY
INJUNCTION**

Petitioner Larysa Kostak respectfully requests, in accordance with Local Rule 65.1, that this Honorable Court grant a temporary restraining order (“TRO”) and preliminary injunction against Respondents because, as demonstrated in the attached memorandum of law and other supporting documents, her detention by Respondents is unlawful.

Petitioner therefore requests an order enjoining Respondents from further detaining her. Undersigned counsel contacted the United States Attorney’s Office for the Western District of Louisiana, who responded via email this afternoon at 3:34 p.m. Central Standard Time noting that they had not yet been able to connect with their client agency but were working to do so.

Accordingly, undersigned counsel will serve a courtesy copy of this motion, supporting documents and proposed order via email to the United States Attorney’s Office while formal service of process is pending, so that they are on notice of all filings and evidence, and will not be prejudiced while formal service is pending.

Dated: July 30, 2025

Respectfully submitted,

Sarah E. Decker*
ROBERT F. KENNEDY HUMAN
RIGHTS
1300 19th Street NW, Suite 750
Washington, DC 20036
Tel.: (908) 967-3245
decker@rfkhumanrights.org

Sarah T. Gillman*
ROBERT F. KENNEDY HUMAN RIGHTS
88 Pine Street, 8th Floor, Suite 801
New York, New York 10005
Tel.: (646) 289-5593
Gillman@rfkhumanrights.org

/s/ Charles Andrew Perry
/s/Nora Ahmed
ACLU Foundation of Louisiana
Charles Andrew Perry
LA Bar No. 40906
Nora Ahmed*
NY Bar No. 5092374
1340 Poydras St., Ste. 2160
New Orleans, LA 70112
Tel: (504) 522-0628
aperry@laaclu.org
nahmed@laaclu.org

Attorneys for Plaintiff

** Pro hac vice applications forthcoming*

CERTIFICATE OF SERVICE PURSUANT TO LOCAL RULE 65.1

I hereby certify on July 30, 2025, I electronically filed the foregoing document, supporting documents, and proposed order with the Clerk of the Court using the CM/ECF system and that a courtesy copy of this Motion and all attachments thereto and the related Petition in this matter will be sent today, July 30, 2025, to the United States Attorney's Office for the Western District of Louisiana, at the following email addresses:

Shannon.Smitherman@usdoj.gov
Terri.Comeaux@usdoj.gov
Desiree.Williams@usdoj.gov

Respectfully submitted,

/s/ Charles Andrew Perry

ACLU Foundation of Louisiana
Charles Andrew Perry
LA Bar No. 40906
1340 Poydras St., Ste. 2160
New Orleans, LA 70112
Tel: (504) 522-0628
aperry@laaclu.org