

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