

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

LARYSA KOSTAK,

Petitioner,

v.

DONALD J. TRUMP, et al.

Respondents.

Civil Action No. 3:25-cv-1093

Judge Jerry Edwards Jr.

**MOTION FOR RELEASE PENDING ADJUDICATION OF PETITIONER'S HABEAS
CORPUS PETITION AND, AS APPLICABLE, HER MOTION FOR A TEMPORARY
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

Petitioner Larysa Kostak ("Larysa" or "Petitioner") submits this motion for immediate release pending adjudication of (1) her temporary restraining order (ECF No. 3, "TRO"), and (2) her habeas corpus petition (ECF No.1), upon which her TRO was premised.

As detailed in the attached memorandum of law, this Court has inherent authority to grant Petitioner's release. *Calley v. Callaway*, 496 F.2d 701, 702 (5th Cir. 1974).

This afternoon (July 31, 2025), Respondents were contacted regarding this Motion for Release and noted that they object to same.

Dated: July 31, 2025

Sarah E. Decker*
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Respectfully submitted,

/s/Charles Andrew Perry
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Attorneys for Plaintiff
** Pro hac vice application pending*

CERTIFICATE OF SERVICE

I hereby certify on July 31, 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 31, 2025, to the United States Attorney's Office for the Western District of Louisiana, at the following email addresses:

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/s/ Charles Andrew Perry