

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

LARYSA KOSTAK,  
Washington, DC 20006  
Tel (908) 967-3245  
v. [louisianarights.org](http://louisianarights.org)

*Petitioner,*

DONALD J. TRUMP, et al.  
ATTORNEY FOR THE DEFENDANT  
RIGHTS  
33 Pine Street, 5th Floor, Suite  
New York, NY 10006  
Tel (646) 239-5293

*Respondents.*

Civil Action No. 3:25-cv-1093

Judge Jerry Edwards Jr.

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

Petitioner Larysa Kostak ("Larysa" or "Petitioner") submits this renewed motion for immediate release. 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).

On September 5, 2025, counsel for Petitioner contacted counsel for Respondents to request their position on this motion and related motions. *See* ECF No. 21, Notice, and 21-1, Correspondence.<sup>1</sup> Counsel for Respondents has not indicated a position, though counsel for Petitioners did clarify that they would understand this to mean they oppose. *See* ECF No. 21-1, Correspondence.

<sup>1</sup> Petitioner's Notice to the Court previously construed this Motion as a Motion to Alter the Judgment of ECF No. 20, Pursuant to Fed. R. Civ. P 59 (e), to Order Her Release. ECF No. 20. In light of the additional considerations at issue in the renewed motion, Petitioner instead moves a second time for her release.

Dated: September 8, 2025

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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 September 8, 2025, I electronically filed the foregoing document, supporting documents, and proposed order with the Clerk of the Court using the CM/ECF system which will send a copy of the foregoing documents to all counsel of record.

*/s/ Charles Andrew Perry*