

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.

**SECOND MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY  
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 on their position on this Motion on September 5, 2025 and did not receive a response.

*See ECF No. 21-1, Correspondence.*

Dated: September 11, 2025

Respectfully submitted,

Sarah E. Decker\*

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*/s/ Charles Andrew Perry*

*/s/ Nora Ahmed*

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**CERTIFICATE OF SERVICE PURSUANT TO LOCAL RULE 65.1**

I hereby certify September 11, 2025, I electronically filed the foregoing document, supporting memorandum, and proposed order with the Clerk of the Court using the CM/ECF system.

Respectfully submitted,

/s/ Charles Andrew Perry

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