


UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF GEORGIA  
COLUMBUS DIVISION

Vladimir KIM	)	Case No. 4:25-cv-262
Petitioner,	)	
	)	
v.	)	
	)	
TERRANCE DICKERSON, <i>in his official capacity</i>	)	
<i>as Warden of Stewart Detention Center, and</i>	)	
TODD LYONS, <i>in his official capacity as Acting</i>	)	Agency # 
<i>Director of Immigration and Customs Enforcement</i>	)	
and GEORGE STERLING, <i>Field Office Director</i>	)	
<i>ICE Atlanta Field Office, and KRISTI NOEM</i>	)	
<i>Secretary of Homeland Security,</i>	)	
	)	
Respondents.	)	
_____	)	

EMERGENCY MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Rule 65(a) of the Federal Rules of Civil Procedure, Petitioner hereby moves this Court for an order that Defendants be enjoined from continuing to detain Petitioner-Plaintiff VLADIMIR KIM (“Mr. Kim”) in custody, and, following his release, be enjoined from re-detaining him without first providing him with a hearing before an Immigration Judge prior to any future re-detention, as required by the Due Process clause of the Fifth Amendment. Petitioner additionally seeks to enjoin Respondents from removing Petitioner from the United States to any third country to which he does not have a removal order without first providing him with constitutionally-compliant procedures.

Since the evidentiary hearing in this case, there have been a number of significant developments, including a second failed attempt to deport Mr. Kim to Uzbekistan and a life-threatening and extremely serious medical development.

On November 11, 2025, Petitioner filed a declaration (**ECF 18**) from his spouse outlining an attempt to remove him without a valid travel document—an attempt which failed, as Respondents acknowledged in their filing on November 18, 2025 (**ECF 19**).

Since that time, Petitioner, who was not returned to Georgia, but instead transported to Mississippi (far from his cardiac surgeon) and suffered a significant medical event. *See*, Second Declaration of Elena Bondari (**Exhibit A**) and Third Declaration of Elena Bondari (**Exhibit B**). Mr Kim was finally returned to Georgia, where he underwent emergency surgery to repair his heart valves. (**Exhibit C**)

Attached as **Exhibit D** are medical records confirming the gravity of Mr. Kim's medical status.

WHEREFORE, Petitioner prays that this Court grant his request for an order requiring ICE to immediately release him from custody (to enjoin the unlawful ongoing detention), enjoining Respondents from re-detaining him before providing him a hearing before an Immigration Judge prior to any re-detention, and enjoining Respondents from removing him to any third country without first providing him with constitutionally-compliant procedures. The only mechanism to ensure that he is not continuously unlawfully detained in violation of his due process rights is an order from this Court.

Respectfully submitted this 24th day of November 2025.

/s/ Helen L Parsonage

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Respondents.	)	
_____	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on November 24, 2025, I electronically filed the foregoing with the Clerk of Court using the CM-ECF system which will send notification of such filing to the following: Michael Morrill, Assistant United States Attorneys. I hereby also certify that there are no parties who do not participate in CM/ECF.

/s/ Helen L Parsonage

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