

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA**

CHANTHILA SOUVANNARATH,
Petitioner,

v.

U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT, *et al.,*

Respondents.

Civil Action No.
25-cv-938-SDD-SDJ

**MOTION TO ENFORCE THE TEMPORARY RESTRAINING ORDER AND COMPEL
PETITIONER'S REPATRIATION**

Petitioner Chanthila Souvannarath submits this Motion to Enforce the Temporary Restraining Order granted in this action (ECF No. 4) and compel his repatriation for further proceedings.

Filing *pro se*, Petitioner submitted a petition for habeas corpus (ECF No. 1) on October 16, 2025. Petitioner filed an amended petition (ECF No. 2) and an Emergency Motion for Stay of Removal and Expedited Order to Show Cause (ECF No. 3) on October 17, 2025.

Upon review of Petitioner's Motion, on October 23, 2025, the Court issued an order "to preserve the status quo until all parties can fully present their arguments on a preliminary injunction." ECF No. 4. That order "immediately prohibited [Respondents] from removing Petitioner Chanthila Souvannarath from the United States and from transferring him out of the jurisdiction of this Court." *Id.* Nevertheless, on October 24, 2025, that is precisely what Respondents did. Mr. Souvannarath was removed to Laos despite and in violation of this Court's Order and the pending petition for habeas corpus. To remedy that violation of this Court's Order,

Petitioner respectfully moves for an order to enforce the Court's October 23, 2025 Order and to order Mr. Souvannarath's repatriation.

WHEREFORE, for these reasons and any other others apparent to this Honorable Court, Petitioner requests that his motion be granted.

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, NY 10005
Tel: (646) 289-5593
gillman@rfkhumanrights.org

Stephanie M. Alvarez-Jones*
Bridget Pranzatelli*
NATIONAL IMMIGRATION PROJECT OF THE NATIONAL LAWYERS GUILD
(National Immigration Project)
1763 Columbia Road NW
Ste. 175 #896645
Washington, DC 20009
T: (202) 470-2082
F: (617) 227-5495
stephanie@nipnlg.org
bridget@nipnlg.org

/s/Charles Andrew Perry
Charles Andrew Perry
LA Bar No. 40906
Nora Ahmed*
NY Bar No. 5092374
ACLU FOUNDATION OF LOUISIANA
1340 Poydras St., Ste. 2160
New Orleans, La 70112
Tel: (504) 522-0628
aperry@laaclu.org
nahmed@laaclu.org

Attorneys for Petitioner
** Pro hac vice application pending*

CERTIFICATE OF SERVICE

I hereby certify that on October 28, 2025, I filed this Motion and its supporting documents with the Clerk via CM/ECF, which will provide electronic notification to counsel of record. A copy of this Motion was submitted to the following email addresses at the United States Attorney's Office for the Middle District of Louisiana, who will be representing Respondents:

davis.rhorer@usdoj.gov

Chase.Zachary@usdoj.gov

/s/ Charles Andrew Perry