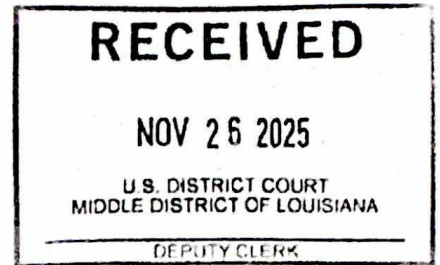


UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF LOUISIANA



EMERGENCY MOTION — IMMINENT UNLAWFUL REMOVAL

TEMPORARY RESTRAINING ORDER REQUESTED

IMMEDIATE STAY OF REMOVAL REQUIRED

Petitioner Faces Removal Within Hours or Days Despite a Pending Appeal and Mandatory Stay

In re:

GARDY GREGORY ALEXANDRE

Petitioner, Pro Se

A# [REDACTED] | ID# [REDACTED]

Camp 57 ICE Processing Center

17544 Tunica Trace

Angola, Louisiana 70712

v.

KEVIN JORDAN, Warden, Camp 57 ICE Processing Center;

PAM BONDI, Attorney General of the United States;

KRISTI NOEM, Secretary, DHS;

TODD LYONS, Acting Director, ICE;

FIELD OFFICE DIRECTOR, ICE/OAKDALE;

CHIEF COUNSEL, OPLA NEW ORLEANS;

UNITED STATES ATTORNEY, M.D. LA.

Case No.: \_\_\_\_\_

EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER

(Immediate Judicial Action Required)

PLEASE PRESENT TO DUTY JUDGE IMMEDIATELY

Alexandre v. Jordan — Emergency TRO Filing

## **EMERGENCY TRO FILING PACKET**

Gardy Gregory Alexandre

United States District Court – Middle District of Louisiana

Alexandre v. Jordan — Emergency TRO Filing

## **NOTICE OF IMMINENT REMOVAL**

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF LOUISIANA

NOTICE OF IMMINENT UNLAWFUL REMOVAL

IMMEDIATE JUDICIAL ATTENTION REQUIRED

Petitioner Gardy Gregory Alexandre, ~~XXXXXXXXXX~~, respectfully submits this Notice to alert the Court to an extraordinary and time-sensitive emergency.

On November 18, 2025, ICE served Petitioner with Form I-294, "Warning to Alien Ordered Removed or Deported," indicating that removal is imminent and may occur within hours or days.

However:

- ✓ Petitioner has a timely and pending appeal before the Board of Immigration Appeals (Exhibit B).
- ✓ Under 8 C.F.R. § 1003.6(a), a timely appeal triggers an automatic, mandatory stay of removal.
- ✓ ICE previously attempted to unlawfully remove Petitioner on September 10, 2025 (Exhibit E).
- ✓ ICE confiscated Petitioner's entire legal and medical file and has refused to return it (Exhibit F).
- ✓ Petitioner is an honorably discharged U.S. Army veteran (Exhibit G).
- ✓ Removal would immediately destroy the Court's habeas jurisdiction and moot the BIA appeal.

Petitioner faces:

Permanent removal without judicial review

Loss of life and safety in Haiti

Devastating medical consequences without VA care

Permanent separation from five U.S.-citizen children

Irreversible nullification of constitutional rights

A jurisdiction-destroying *fait accompli* in violation of *Nken*, *Boumediene*, and *Dean Foods*

THEREFORE:

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Petitioner respectfully requests that this filing be presented to the duty judge immediately and that the Court issue an immediate Temporary Restraining Order to halt removal until the Motion is resolved.

Respectfully submitted,

Gardy Gregory Alexandre, Pro Se 

A#  | ID# 

Camp 57 ICE Processing Center

Angola, Louisiana

Alexandre v. Jordan — Emergency TRO Filing

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**EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER**

**EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER AND IMMEDIATE STAY OF REMOVAL**

**SECTION I — INTRODUCTION AND IMMEDIATE EMERGENCY**

COMES NOW Petitioner Gardy Gregory Alexandre, pro se, in the above-captioned habeas corpus action already pending before this Honorable Court under 28 U.S.C. § 2241, and respectfully submits this Emergency Motion for a Temporary Restraining Order and Immediate Stay of Removal. Petitioner seeks this Court's immediate intervention because on November 18, 2025, ICE served him with Form I-294, "Warning to Alien Ordered Removed or Deported" (Exhibit A), indicating that ICE intends to remove him within hours or days, despite:

- (1) his timely and still-pending BIA appeal, documented in the EOIR Automated Case Information record (Exhibit B);
- (2) the automatic stay of removal under 8 C.F.R. § 1003.6(a);
- (3) his habeas petition and supplemental filing already pending before this Court; and
- (4) constitutional and statutory limits preventing the Executive from extinguishing judicial review through unlawful removal.

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This Motion arises within Petitioner's already-pending habeas case, and the emergency relief sought is necessary solely to preserve the Court's ability to adjudicate the filings already before it.

**A. Imminent Removal Confirmed by Form I-294 (Exhibit A)**

Form I-294 is not a routine notice. It is issued only immediately before deportation. The copy served on Petitioner is attached as Exhibit A, demonstrating that ICE is actively preparing for imminent removal in defiance of the automatic stay and this Court's jurisdiction.

**B. Federal Courts — Including This District — Have Reprimanded ICE for Similar Conduct**

In *Pierre v. Garland* (M.D. La. 2024), the Court reprimanded ICE's "disregard for judicial process" when ICE attempted removal during a pending appeal.

In *Souvannarath v. ICE* (M.D. La. 2025), the Court admonished ICE for attempting premature removal during ongoing litigation.

Other courts have condemned ICE's attempts to circumvent judicial review through rushed removals.

See *Mendez v. INS*, 563 F.2d 956 (9th Cir. 1977); *Singh v. Waters*, 87 F.3d 346 (9th Cir. 1996).

ICE's conduct here follows this same pattern, with documentary proof:

Exhibit A (Form I-294 — imminent removal),

Exhibit B (appeal pending — stay in effect),

Exhibit H (previous written notices to ICE/OPLA warning of illegal removal).

**C. ICE Already Attempted an Unlawful Removal on September 10, 2025**

On September 10, 2025, ICE attempted to deport Petitioner even though his appeal was pending. Petitioner informed ICE of his active appeal, yet ICE continued until the very last moment — confirming actual notice of the stay.

Evidence of this prior unlawful attempt is included as Exhibit E.

During that attempt, ICE confiscated his entire legal file and VA medical records, which were never returned (Exhibit F). This ongoing deprivation causes severe prejudice and demonstrates ICE's disregard for legal protections, due process, and Petitioner's access to the court.

**D. Petitioner Is a U.S. Army Veteran — and ICE Is Violating Its Own Directive**

Petitioner is a lawful permanent resident of nearly 40 years, an honorably discharged U.S. Army veteran, and the father of five U.S.-citizen children. His Declaration regarding military service is attached as Exhibit G.

Congressional letters urging DHS to halt veteran removals are included as Exhibits C and D.

Additionally, ICE's conduct violates its own veteran-protection policy:

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ICE Directive 10039.2, requiring:

identification of veterans in custody, "special consideration" in removal decisions, elevated supervisory review, and notification of senior officials.

ICE provided none. ICE attempted removal on September 10 without any veteran review (Exhibit E), confiscated VA records (Exhibit F), and is now preparing another unlawful attempt as shown by Exhibit A.

E. Imminent Removal Would Destroy Jurisdiction and Create a *Fait Accompli* If ICE

removes Petitioner: the BIA will dismiss his appeal as moot (Exhibit B proves it is pending); the automatic stay becomes meaningless; this Court loses habeas jurisdiction because he will no longer be "in custody"; judicial review is permanently extinguished; and

ICE will have succeeded in creating the exact unconstitutional *fait accompli* federal courts condemn.

Courts forbid ICE from "beating the Court to the airport" to extinguish judicial review.

See *Nken v. Holder*, *St. Cyr*, *Boumediene*.

F. Immediate Action Is Required to Protect This Court's Jurisdiction and Petitioner's Life

All documentary evidence — Exhibits A, B,

C, D, E, F, G, and H —

shows that ICE is preparing imminent removal despite a pending appeal, an automatic stay, and this Court's active jurisdiction.

Emergency relief is required to:

preserve the Court's authority, prevent unlawful removal, safeguard judicial review, enforce the automatic stay, and protect the life of a U.S. Army veteran.

## SECTION II — JURISDICTION AND AUTHORITY

This Emergency Motion is filed within Petitioner's already-pending § 2241 habeas case, and seeks only to preserve the Court's ability to adjudicate the filings already before it.

On November 18, 2025, ICE served Petitioner with Form I-294 (Exhibit A), creating an immediate jurisdiction-destroying threat.

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The BIA appeal remains pending as shown in Exhibit B.

Habeas Jurisdiction Under § 2241

Petitioner is detained within this District. The Court therefore has jurisdiction.

See Padilla, 542 U.S. at 447.

Petitioner's habeas petition and supplement are already filed; this Emergency Motion preserves that jurisdiction.

Timely Appeal = Automatic Stay (Exhibit B)

Under 8 C.F.R. § 1003.6(a), Petitioner's timely BIA appeal — confirmed in Exhibit B — automatically stays removal.

ICE's service of Form I-294 (Exhibit A) is therefore unlawful on its face.

Removal Would Destroy Jurisdiction and Moot the Appeal

If ICE removes Petitioner:

This Court loses habeas jurisdiction;

The BIA appeal (Exhibit B) will be dismissed;

The stay becomes meaningless;

Judicial review disappears.

This constitutes the unconstitutional *fait accompli* federal courts forbid.

The All Writs Act Authorizes a TRO

28 U.S.C. § 1651 allows courts to issue all writs necessary to protect jurisdiction — including staying removal.

Rule 65(b) Requires Emergency Relief

Petitioner faces immediate and irreparable harm:

Form I-294 shows imminent deportation (Exhibit A)

ICE already attempted unlawful removal (Exhibit E)

ICE is acting with actual notice of the stay (Exhibit H)

Together, these satisfy Rule 65(b).

Separation of Powers Demands Intervention

The Executive may not extinguish judicial review or manipulate physical custody to evade jurisdiction.

A TRO is therefore required.

SECTION III — FACTUAL BACKGROUND

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Petitioner is a longtime lawful permanent resident of nearly forty years, an honorably discharged U.S. Army veteran, and the father of five U.S.-citizen children. His military service and sworn declaration are included as Exhibit G. His timely appeal to the Board of Immigration Appeals was filed on June 20, 2025 and remains pending, as shown by the EOIR Automated Case Information record (Exhibit B). Under 8 C.F.R. § 1003.6(a), removal is automatically stayed.

Despite this, ICE has shown a pattern of escalating unlawful conduct in this case, culminating in the service of a pre-deportation Form I-294 on November 18, 2025, attached as Exhibit A, indicating that removal is imminent.

**The September 10, 2025 Unlawful Removal Attempt and Confiscation of Petitioner's File**

On September 10, 2025, ICE attempted to deport Petitioner to Haiti while his BIA appeal was actively pending and automatically stayed.

During this attempt:

Petitioner told ICE officers that his appeal was active.

ICE acknowledged receipt of this information but continued with the removal process.

ICE confiscated Petitioner's entire legal and VA medical file, including documents he needed for his BIA appeal, habeas petition, and request for veteran services.

These materials were never returned.

The facts of the unlawful removal attempt are documented in Exhibit E, and the ongoing loss of Petitioner's legal and medical file is documented in Exhibit F.

The confiscation of these records has severely impaired Petitioner's ability to litigate in both the BIA and this Court. ICE's refusal to return the records — now for more than two months — demonstrates a disregard for due process and Petitioner's federal rights.

**ICE Had Actual Notice of the Pending Appeal and the Automatic Stay**

Petitioner repeatedly notified ICE and OPLA New Orleans that:

His BIA appeal was pending;

The automatic stay under 8 C.F.R. § 1003.6(a) was in effect; Any removal attempt would be unlawful.

Copies of these written notices are included as Exhibit H.

ICE thus acted — and continues to act — with actual notice that removal is prohibited. Any claim of misunderstanding or administrative oversight is contradicted by these records.

**Petitioner's Status as a U.S. Army Veteran Triggered Mandatory Protections Under ICE Directive 10039.2, But ICE Ignored These Safeguards**

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Petitioner is an honorably discharged U.S. Army veteran. Federal law and ICE policy mandate heightened procedural protections for veterans.

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ICE Directive 10039.2 requires:

Identification of all veterans in ICE custody;

"Special consideration" before detention or removal;

Elevated supervisory review; and

Notification of senior DHS leadership prior to enforcement.

ICE did none of this.

Congressional letters urging DHS to halt deportations of veterans are included as Exhibits C and D. Despite substantial national concern and DHS's own policies, ICE has treated Petitioner with less protection — not more — even after confiscating his VA records (Exhibit F) and now threatening a second removal attempt (Exhibit A).

D. The BIA Appeal Remains Pending, and Removal Would Nullify Jurisdiction

Petitioner's BIA appeal is documented as active and pending in Exhibit B.

Removal during a pending appeal is not only prohibited under 8 C.F.R. § 1003.6(a) — it would immediately:

Force the BIA to dismiss for mootness;

Nullify the statutory appeal rights Congress created;

Destroy habeas jurisdiction in this Court; and

Permanently extinguish judicial review.

ICE is fully aware of this.

Yet it is attempting to use physical removal to "beat the Court to the airport" — a tactic federal courts have repeatedly condemned.

ICE's Pattern of Disregarding Judicial Process, Including in This District

Federal courts in this District have repeatedly reprimanded ICE for attempting to remove individuals despite pending appeals or active judicial review.

In *Pierre v. Garland* (M.D. La. 2024), the Court found that ICE's "disregard for judicial process" jeopardized constitutional rights.

In *Souvannarath v. ICE* (M.D. La. 2025), the Court criticized ICE for attempting removal while the petitioner's derivative citizenship claim remained unresolved.

The facts here mirror — and arguably exceed — those in *Pierre* and *Souvannarath*:

ICE attempted unlawful removal once already (Exhibit E);

ICE confiscated Petitioner's legal file (Exhibit F);

ICE ignored multiple written notices (Exhibit H);

ICE served Form I-294 indicating second imminent removal (Exhibit A);

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All while a timely BIA appeal remains pending (Exhibit B).

This Court is confronted with an even more aggressive scenario than those federal courts already found unconstitutional.

Service of Form I-294 on November 18, 2025 Confirms Removal Is Imminent

On November 18, 2025, ICE served Petitioner with Form I-294, attached as Exhibit A.

This form is not used for routine custody updates; it is used only when ICE is preparing to execute removal.

Form I-294 is typically served 24–72 hours before removal, confirming that:

The threat is real

The harm is imminent

ICE intends to act before the Court can rule

Without a TRO, ICE may attempt deportation within days or even hours

This is the exact type of jurisdiction-destroying emergency the Supreme Court addressed in *Nken*, *Boumediene*, and *St. Cyr*.

Petitioner Faces Grave Danger if Removed to Haiti

Petitioner's father, a political figure, was targeted by gang-connected actors before his death. Petitioner was previously warned that his removal would put him at risk. Removal to Haiti — now in a state of violent instability — would expose him to immediate and irreparable harm.

ICE's attempt to carry out removal in defiance of a stay exacerbates the risk by eliminating any opportunity for judicial review.

#### SECTION IV — LEGAL STANDARD FOR TRO

A Temporary Restraining Order ("TRO") may be issued under Federal Rule of Civil Procedure 65(b) when the moving party demonstrates:

- (1) a likelihood of success on the merits;
- (2) a likelihood of immediate and irreparable harm absent injunctive relief;
- (3) that the balance of equities tips in his favor; and
- (4) that a TRO is in the public interest.

*Nken v. Holder*, 556 U.S. 418, 434 (2009); *Winter v. NRDC*, 555 U.S. 7, 20 (2008).

Federal courts routinely apply these standards in the immigration and habeas context, particularly when unlawful removal threatens to nullify appellate rights or destroy jurisdiction. Courts recognize that "removal prior to judicial review causes irreparable injury," *Nken*, 556 U.S. at 435, and that the Executive may not defeat judicial authority by physically transferring or removing a litigant during active review.

See *Boumediene v. Bush*, 553 U.S. 723, 765 (2008).

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Under 28 U.S.C. § 2241, district courts have broad equitable authority to protect their jurisdiction and prevent unlawful governmental action. Habeas courts may “fashion appropriate relief,” including halting removal, when necessary to preserve the integrity of their judicial power. See *Boumediene*, 553 U.S. at 779; *Kumarasamy v. Attorney General*, 453 F.3d 169, 172–73 (3d Cir. 2006).

Additionally, the All Writs Act, 28 U.S.C. § 1651(a), authorizes federal courts to issue “all writs necessary or appropriate in aid of their respective jurisdictions.” This includes issuing emergency stays of removal to prevent a jurisdiction-destroying fait accompli.

See *FTC v. Dean Foods Co.*, 384 U.S. 597, 603–04 (1966); *United States v. New York Tel. Co.*, 434 U.S. 159, 172 (1977).

When, as here, the Government attempts deportation despite a mandatory regulatory stay (see 8 C.F.R. § 1003.6(a)), courts apply the TRO standard with heightened scrutiny because jurisdiction, due process, and the right to judicial review are in immediate jeopardy.

Removal during an active stay has been declared unlawful, void, and constitutionally infirm.

See *Jama v. INS*, 329 F.3d 630, 632 (8th Cir. 2003) (removal in violation of stay is “invalid and without legal effect”); *Singh v. Waters*, 87 F.3d 346, 349 (9th Cir. 1996) (ordering Government to return petitioner unlawfully removed in violation of stay).

Thus, where removal threatens to moot a pending BIA appeal and extinguish habeas jurisdiction, a TRO is not merely appropriate — it is constitutionally required to prevent the Executive from undermining the judicial process.

Emergency relief is particularly warranted where, as here:

ICE has already attempted one unlawful removal;

ICE issued Form I-294 indicating imminent deportation (Exhibit A);

The timely appeal is pending (Exhibit B); Removal would nullify judicial review; and

The life of a U.S. Army veteran is at stake.

Under these principles, Petitioner meets — and exceeds — every element required for issuance of a TRO.

## SECTION V — ARGUMENT

(A) Likelihood of Success

(B) Irreparable Harm

(C) Balance of Equities

(D) Public Interest

## SECTION V — ARGUMENT

Petitioner Is Likely to Succeed on the Merits

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## V. ARGUMENT

### Petitioner Is Likely to Succeed on the Merits

Petitioner easily satisfies the first and most important TRO factor: he is overwhelmingly likely to succeed on the merits of the claims raised in both his pending habeas petition and this Emergency Motion. The Government is preparing to remove him in direct violation of binding federal regulations, established constitutional principles, and the Court's own jurisdiction.

Petitioner's likelihood of success is supported by three independent legal grounds:

### Petitioner Is Protected by the Automatic Stay Under 8 C.F.R. § 1003.6(a)

The regulation provides:

"Execution of the decision shall be stayed upon the filing of a timely appeal."

Petitioner filed a timely appeal on June 20, 2025, which the BIA docketed and continues to list as active (Exhibit B).

Thus, as a matter of binding federal law, removal is automatically stayed.

ICE's service of Form I-294 (Exhibit A) — which is issued only immediately before removal — is therefore unlawful on its face. The Government has no legal authority to execute removal in the presence of an automatic stay.

Federal courts enforce this protection strictly.

See:

*Pierre v. Garland* (M.D. La. 2024) (rebuking ICE for attempting removal during pending appeal),

*Singh v. Waters*, 87 F.3d 346, 349 (9th Cir. 1996) (ordering return after removal during active stay),

*Mendez v. INS*, 563 F.2d 956 (9th Cir. 1977) (same).

Petitioner is therefore likely to prevail on his claim that ICE is violating federal law.

### ICE's Removal Plan Violates the Constitution and the Separation of Powers

ICE's imminent removal attempt would destroy habeas jurisdiction and moot the BIA appeal — a result the Supreme Court has condemned repeatedly.

The Government may not:

Manipulate custody to defeat jurisdiction,

Deprive courts of the ability to adjudicate pending cases, or

Create a jurisdiction-destroying fait accompli by removing a litigant before judicial review.

See:

*Boumediene v. Bush*, 553 U.S. 723, 765 (2008),

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INS v. St. Cyr, 533 U.S. 289, 314 (2001),

Nken v. Holder, 556 U.S. 418, 435 (2009).

Because Petitioner's habeas petition and supplement are already pending, and because removal would extinguish this Court's jurisdiction instantly, Petitioner is likely to prevail on his constitutional claims as well.

Federal courts have consistently rejected ICE's attempts to "beat the Court to the airport" — the same tactic ICE is attempting here, as confirmed by Exhibit A.

**ICE Already Attempted Unlawful Removal Once, Strengthening the Likelihood of Success**

On September 10, 2025, ICE attempted to deport Petitioner in violation of the automatic stay and despite actual notice of his pending appeal. This is fully documented in Exhibit E.

ICE also confiscated his legal and VA medical records (Exhibit F), actions that prejudice litigation and violate due process.

Courts treat such conduct as strong proof of unlawful agency behavior and as justification for immediate judicial intervention. The Middle District of Louisiana itself has reprimanded ICE for similar misconduct.

See Pierre; Souvannarath.

Petitioner's likelihood of success is therefore bolstered by concrete evidence of past unlawful conduct, not merely threatened conduct.

**Petitioner Is a U.S. Army Veteran and ICE Is Violating Its Own Mandatory Directive**

ICE Directive 10039.2 imposes mandatory protections for veterans. ICE must:

Identify veterans,

Apply "special consideration,"

Conduct elevated supervisory review, and

Notify DHS leadership before enforcement.

ICE has violated each of these requirements, despite having documentation of Petitioner's service (Exhibit G).

Federal courts consistently find agency action unlawful where the agency violates its own binding regulations or internal directives.

Moreover, Congressional letters (Exhibits C & D) underscore the heightened equities and national interest at stake. ICE's refusal to comply with its veteran directive exposes the removal plan as arbitrary, capricious, and unlawful.

**Habeas Jurisdiction Has Already Attached — and ICE Cannot Extinguish It**

Petitioner has a habeas petition and supplemental filing pending.

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The Government is attempting to defeat jurisdiction by removing him before this Court can rule — an unconstitutional practice federal courts forbid.

The Supreme Court has repeatedly held that habeas courts have broad equitable authority to prevent unlawful government action.

See *Boumediene*, *Padilla*, *Hamdi*, *Dean Foods*.

Petitioner is therefore likely to succeed on the claim that ICE's attempt to remove him would unlawfully interfere with the Court's jurisdiction.

Conclusion of V(A)

For each of these independent reasons — regulatory, constitutional, jurisdictional, and procedural — Petitioner easily satisfies the first factor. Indeed, the facts and exhibits establish that Petitioner is not merely likely but overwhelmingly certain to succeed on the merits of his claims.

#### SECTION V(B) — IRREPARABLE HARM

Petitioner Faces Immediate and Irreparable Harm Without a TRO

The irreparable harm standard is satisfied where the movant faces injury that is certain, imminent, and cannot be undone by later relief. *Winter*, 555 U.S. at 22.

Removal during active judicial review constitutes irreparable harm as a matter of law. *Nken v. Holder*, 556 U.S. 418, 435 (2009).

Petitioner easily meets — and exceeds — this standard.

Removal Would Permanently Destroy Judicial Review and Moot the Appeal

If ICE removes Petitioner before this Court can rule:

His BIA appeal (Exhibit B) will be dismissed as moot;

The automatic stay under 8 C.F.R. § 1003.6(a) becomes meaningless;

This Court's §2241 jurisdiction will evaporate instantly;

All federal judicial review will be lost forever; and

None of these harms could be reversed.

Courts repeatedly hold that the loss of judicial review is itself irreparable harm.

See *Nken*, 556 U.S. at 435; *St. Cyr*, 533 U.S. at 314.

This Court has issued similar warnings in its own decisions.

See *Pierre v. Garland* (M.D. La. 2024) (ICE's attempted removal "raised serious constitutional concerns").

ICE's Service of Form I-294 Confirms Imminent Removal (Exhibit A)

Petitioner was served with Form I-294 on November 18, 2025, attached as Exhibit A.

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This form is used only immediately before deportation, typically within 24–72 hours of removal.

This is concrete proof that:

The threat is real;

Removal is imminent;

ICE intends to act quickly; and

ICE may attempt to remove Petitioner before the Court can intervene.

Federal courts regularly grant TROs when Form I-294 is served, recognizing it as incontrovertible evidence of imminent harm.

ICE Already Attempted an Unlawful Removal on September 10, 2025 (Exhibit E)

Petitioner is not speculating about ICE misconduct — it already happened.

On September 10, 2025, ICE attempted to remove him:

During an active appeal;

In violation of the automatic stay;

Despite actual notice;

And despite Petitioner warning ICE that removal was unlawful.

The documentary evidence is in Exhibit E.

This single fact — that ICE tried to illegally remove Petitioner once before — drastically elevates the risk of irreparable harm.

Federal courts treat patterns of unlawful agency conduct as powerful evidence supporting emergency relief. See *Singh v. Waters*, 87 F.3d at 349.

ICE Confiscated Petitioner's Legal File and VA Records, Making Removal Even More Prejudicial (Exhibit F)

During the September 10 attempt, ICE  
confiscated: Petitioner's entire legal file, His VA  
medical documentation, and  
His immigration case materials.

Those materials have not been returned (Exhibit F).

If Petitioner is removed without these documents:

He cannot litigate his BIA appeal;

He cannot pursue his habeas claims;

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He cannot prove his veteran status or medical needs;

He cannot access U.S. courts;

He cannot obtain VA medical care abroad.

Federal courts recognize that interference with access to courts constitutes irreparable harm.

See *Bounds v. Smith*, 430 U.S. 817 (1977).

**Petitioner Faces Grave Dangers in Haiti — Harm Which Is Immediate and Potentially Fatal**

Petitioner's father — a political figure — was targeted by gang-connected actors. Petitioner was warned that his own safety would be in jeopardy upon return. Removal to Haiti now, amid unparalleled gang violence, would expose Petitioner to:

Immediate physical harm,

Retribution tied to his father's political history,

Homelessness in a collapsed state,

Medical vulnerability due to chronic conditions and lack of treatment, and

Heightened targeting due to his U.S. military background.

Courts repeatedly hold that threats to personal safety, medical harm, or danger of violence constitute irreparable harm.

**Removal Would Sever Petitioner From His U.S.-Citizen Children and Destroy Their Relationship**

Petitioner is the father of five U.S.-citizen children, two of whom he shares custody of. Removal would result in:

Permanent separation,

Psychological trauma to the children,

Loss of parental guidance,

Destabilization of the family unit.

Federal courts recognize family separation as a classic example of irreparable harm.

**Petitioner Is a U.S. Army Veteran — Removal Would Irreparably Deprive Him of Federal Rights and Protections**

As a veteran:

Petitioner is entitled to VA medical treatment,

Federal support services,

Mental-health care, and

Benefits not available abroad.

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Removal to Haiti would permanently sever these protections.

ICE's violation of ICE Directive 10039.2 compounds this harm.

Courts recognize that agency disregard of mandatory veteran protections weighs heavily in favor of injunctive relief.

ICE Is Attempting to Create a Jurisdiction-Destroying Fait Accompli

The combination of:

Service of Form I-294 (Exhibit A),

The prior unlawful removal attempt (Exhibit E),

Confiscation of legal files (Exhibit F),

Refusal to return those files,

Refusal to acknowledge the automatic stay (Exhibit B), and

Disregard of written notices (Exhibit H)

Shows that ICE is trying to execute removal before the Court can intervene — the exact "fait accompli" the Supreme Court warns federal courts to prevent. *Boumediene*, 553 U.S. at 765.

This is irreparable harm of the highest order.

Conclusion of V(B)

The evidence — supported by Exhibits A through H — demonstrates that Petitioner faces immediate, severe, and irreversible harm absent a TRO. The second TRO factor is therefore overwhelmingly satisfied.

#### SECTION V (C) — BALANCE OF EQUITIES

The Balance of Equities Strongly Favors Petitioner

The balance of equities overwhelmingly favors granting a TRO. On one side stands Petitioner's fundamental right to judicial review, his pending BIA appeal, the automatic stay mandated by federal regulation, and the life-threatening consequences of unlawful removal. On the other side stands the Government's interest in enforcing an order that it is statutorily prohibited from executing at this time.

**Petitioner Risks Loss of Life, Separation From Children, and Permanent Exile Without Review**

The harms Petitioner faces are severe, immediate, and irreversible:

Imminent deportation (Exhibit A);

Prior unlawful removal attempt (Exhibit E);

Confiscation of his legal/medical file (Exhibit F);

Danger in Haiti due to family political history and current instability;

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Separation from five U.S.-citizen children;

Loss of VA medical care owed to him as a veteran;

Inability to pursue his pending BIA appeal (Exhibit B);

Destruction of habeas jurisdiction already invoked.

These harms are catastrophic and outweigh any speculative government interest.

The Government Faces No Legally Cognizable Harm From a TRO

The Government cannot claim harm from being temporarily restrained from doing something it is already prohibited from doing under federal law.

By regulation:

"Execution of the decision shall be stayed upon the filing of a timely appeal."

8 C.F.R. § 1003.6(a)

Petitioner's appeal is timely and pending (Exhibit B). Thus, ICE has no lawful interest in removing him now.

The Government has no legitimate hardship when the requested TRO merely enforces a mandatory stay already in effect.

Courts routinely hold that the Government suffers no injury from being restrained from violating the law.

See *League of Women Voters v. Newby*, 838 F.3d 1 (D.C. Cir. 2016).

ICE's Past Misconduct Tilts the Equities Further Toward Petitioner

The equities weigh even more heavily in Petitioner's favor because ICE:

Attempted an unlawful removal on September 10, 2025 (Exhibit E);

Confiscated Petitioner's legal file (Exhibit F);

Acted with actual notice from Petitioner and counsel (Exhibit H);

Is again preparing removal despite binding regulation and active appeal;

Violated its own veteran-protection directive;

Ignored its responsibility to create a safe and constitutional process.

Courts in this District have reproached similar ICE misconduct.

See *Pierre v. Garland* (M.D. La. 2024); *Souvannarath v. ICE* (M.D. La. 2025).

Where the Government has acted unlawfully before, courts treat the equities as decisively favoring the petitioner.

The Balance of Harms Is Asymmetrical and Unmistakable

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Petitioner's Harm Government's Harm

Loss of life None

Permanent exile None

Mooted BIA appeal (Exhibit B) None

Destroyed habeas jurisdiction None

Permanent family separation None

Loss of federal veteran benefits None

Danger in Haiti None

Confiscated legal records (Exhibit F) None

The inequity is absolute.

Federal Courts Emphasize That When Jurisdiction Is Threatened, Equities Favor Emergency Relief

The Supreme Court and multiple circuits hold that when jurisdiction is in danger of being defeated by removal, the equities strongly favor maintaining the status quo until the Court can review the case.

See:

Nken v. Holder, 556 U.S. 418, 435 (2009);

St. Cyr, 533 U.S. at 314;

Boumediene, 553 U.S. at 739;

Dean Foods, 384 U.S. at 603–04.

Petitioner is therefore correct on both fact and law: the equities weigh powerfully on his side.

Conclusion of V (C)

Petitioner's harms are profound, immediate, and irreversible. The Government faces no lawful harm from being restrained from violating a mandatory stay. Accordingly, the balance of equities overwhelmingly favors Petitioner

SECTION V(D) — PUBLIC INTEREST

D. The Public Interest Decisively Favors Granting a TRO

Federal courts consistently hold that the public interest is served when courts:

- (1) enforce federal law;
- (2) uphold constitutional protections;
- (3) preserve judicial review; and

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(4) prevent the Government from acting unlawfully.

All four principles apply here with exceptional force.

1. The Public Has a Strong Interest in Preventing Unlawful Removal During an Active Appeal  
Federal regulation mandates that Petitioner's removal is stayed during his pending BIA appeal (Exhibit B) under 8 C.F.R. § 1003.6(a). The public has a clear interest in ensuring that: immigration laws are followed, the Government adheres to its own regulations, judicial review is not nullified, and immigration enforcement does not devolve into lawlessness.

Courts hold that "the public interest is served by ensuring the Government complies with its own statutes and regulations."

League of Women Voters v. Newby, 838 F.3d 1, 12 (D.C. Cir. 2016).

Here, the Government is attempting to do the opposite by preparing to execute removal despite a binding stay.

2. The Public Has a Profound Interest in Ensuring That Veterans Are Not Illegally Deported  
Petitioner is an honorably discharged U.S. Army veteran (Exhibit G).

His removal implicates the national interest in:

honoring military service; preventing government mistreatment of veterans; ensuring ICE complies with ICE Directive 10039.2; ensuring veterans maintain access to VA healthcare; and protecting vulnerable veterans from harm.

Congressional leaders across both chambers have expressed grave concern regarding the deportation of U.S. veterans. Their bipartisan letters to DHS (included as Exhibits C & D) affirm that the public has a direct and compelling interest in preventing unlawful removal of those who served this country.

Public confidence in the immigration system erodes when the Executive targets veterans in defiance of its own veteran protections.

3. The Public Interest Favors Maintaining the Court's Ability to Exercise Its Jurisdiction

ICE's imminent removal attempt — evidenced by Exhibit A (Form I-294) — threatens to defeat this Court's jurisdiction and render its habeas review meaningless.

Courts hold that the public interest is served when courts retain the ability to decide cases properly before them.

See:

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Nken v. Holder, 556 U.S. 418, 435 (2009);

Boumediene v. Bush, 553 U.S. 723, 745 (2008);

Dean Foods, 384 U.S. 597, 603–04 (1966).

The public has an interest in preventing the Executive from: mooted judicial cases, evading judicial review, ignoring lawful stays, or creating jurisdiction-destroying fait accompli through removal.

Granting a TRO protects the integrity and independence of the judiciary.

#### 4. The Public Interest Strongly Favors Preventing Removal to a Country in Crisis

Haiti is experiencing catastrophic levels of:

gang violence,

political collapse,

abductions,

extrajudicial killings.

Petitioner faces grave danger if removed, particularly given the targeting of his father by gang-connected actors.

The public interest supports preventing the United States from sending a U.S. Army veteran into life-threatening conditions before lawful review is complete.

#### 5. The Public Interest Favors Ensuring Access to Courts and Due Process

ICE confiscated Petitioner's legal file and VA records (Exhibit F) and has refused to return them.

Removal under these circumstances would: obstruct access to courts, undermine due process, prevent Petitioner from participating meaningfully in his appeal and habeas case, and signal governmental impunity.

The public interest includes ensuring that litigants — especially detained, indigent, or veteran petitioners — have meaningful access to judicial remedies.

#### 6. The Government Suffers No Injury From Being Required to Follow the Law

Granting a TRO merely enforces:  
a mandatory regulatory stay, basic constitutional protections, and the Court's own jurisdiction.

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The Government cannot argue that the public interest supports allowing it to act unlawfully.

Courts repeatedly hold the public interest always favors:

constitutional compliance, adherence to statutory  
command, and restraint of executive overreach.

Conclusion of V(D)

The public interest — judicial, constitutional, humanitarian, and national — overwhelmingly supports the issuance of a Temporary Restraining Order to prevent the unlawful removal of a U.S. Army veteran while his appeal and habeas petition remain pending.

#### SECTION VI — THE COURT MUST ACT IMMEDIATELY TO PRESERVE ITS JURISDICTION AND PREVENT A JURISDICTION-DESTROYING FAIT ACCOMPLI

Federal courts possess inherent authority — as well as express statutory authority under 28 U.S.C. § 2241, § 1651(a), and Fed. R. Civ. P. 65(b) — to prevent the Executive Branch from Nullifying judicial review through rushed or unlawful removal actions. That authority is at its apex where, as here, removal would extinguish jurisdiction, moot a pending appeal, and inflict irreparable harm before the court can adjudicate the merits.

ICE's service of Form I-294 on November 18, 2025 (Exhibit A) is clear evidence that ICE intends to remove Petitioner imminently, notwithstanding:

An active BIA appeal (Exhibit B),

A mandatory regulatory stay,

A pending habeas petition and supplement, and

Multiple written notices to ICE demonstrating actual knowledge of the stay (Exhibit H).

The law does not permit the Government to accomplish by physical removal what it cannot accomplish legally through the courts.

#### A. The All Writs Act Empowers the Court to Prevent Unlawful Removal Designed to Defeat Its Jurisdiction

Under the All Writs Act, 28 U.S.C. § 1651(a):

Courts "may issue all writs necessary or appropriate in aid of their respective jurisdictions."

This includes orders:

Restraining executive action,

Preserving the status quo,

Preventing manipulation of custody,

Maintaining access to the court, and

Ensuring judicial review is not rendered meaningless.

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The Supreme Court has repeatedly affirmed that courts must prevent executive actions that would "defeat their jurisdiction." See:

Dean Foods, 384 U.S. at 603–04;

Boumediene v. Bush, 553 U.S. 723, 765 (2008);

Padilla, 542 U.S. at 447;

St. Cyr, 533 U.S. at 314.

ICE's service of Form I-294 indicates an intent to create exactly the type of fait accompli the All Writs Act exists to prevent.

**B. Removal Would Immediately Divest the Court of Jurisdiction and Moot Petitioner's Appeal — a Result Courts Forbid**

The Supreme Court warns that the Executive may not:

Transfer a detainee,

Relocate a detainee, or

Remove a detainee

In a manner that destroys federal jurisdiction.

Boumediene, 553 U.S. at 765.

If Petitioner is removed:

This Court's habeas jurisdiction ceases instantly (he is no longer "in custody"),

The BIA appeal (Exhibit B) becomes moot,

The automatic stay becomes meaningless,

Petitioner becomes unreachable to the Court,

His ability to litigate collapses, and

ICE achieves through speed what it could not achieve through law.

Multiple circuits have ordered the Government to return unlawfully removed individuals because removal during judicial review is void.

See *Singh v. Waters*, 87 F.3d 346, 349 (9th Cir. 1996); *Mendez v. INS*, 563 F.2d 956 (9th Cir. 1977).

But the harm here would be far more severe because Petitioner's legal/medical files remain confiscated (Exhibit F) and Haiti presents a life-threatening environment.

The Court must therefore act now — before ICE can strip the Court of power to act at all.

**ICE's Pattern of Disregarding Judicial Process Requires Immediate Judicial Intervention**

ICE has:

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Attempted unlawful removal once already (Exhibit E),  
Confiscated Petitioner's legal and VA records (Exhibit F),  
Ignored written notice of the pending appeal (Exhibit H),  
Violated mandatory veteran-protection rules (ICE Directive 10039.2),  
And served pre-removal Form I-294 (Exhibit A).

Federal courts — including courts in this District — have condemned such behavior.

See *Pierre v. Garland* (M.D. La. 2024); *Souvannarath v. ICE* (M.D. La. 2025).

Where the Government has shown a willingness to disregard the law, courts must act swiftly to preserve their jurisdiction and protect petitioners from unconstitutional harm.

**D. Only Immediate Judicial Relief Can Prevent the Loss of Life, Liberty, and Constitutional Protections**

The harms at stake include:

Permanent loss of judicial review;

Loss of habeas jurisdiction;

Mooting of an active BIA appeal;

Medical jeopardy due to lack of VA care;

Life-threatening conditions in Haiti;

Loss of access to courts;

Permanent separation from U.S.-citizen children;

And the targeting of a U.S. Army veteran in a collapsed state.

These harms are irreversible.

No subsequent court order can restore:

A mooted administrative appeal, A

lost habeas proceeding, A life

endangered in Haiti, A family

permanently shattered, or

A veteran's lost federal protections.

Only a Temporary Restraining Order can prevent such an outcome.

**Courts Act in Precisely These Circumstances — When the Executive Is Trying to Act Faster Than Judicial Review Can Function**

This case represents the textbook definition of why TROs exist:

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Imminent unlawful executive action,  
Creating irreparable harm,  
Designed to defeat jurisdiction,  
In the face of a statutory stay,  
During active judicial review,  
With constitutional rights at stake,  
And a veteran's life in danger.

The Court's intervention is not only appropriate — it is required to preserve the rule of law, separation of powers, and the integrity of judicial review.

#### SECTION VII — PRAYER FOR RELIEF

WHEREFORE, for all the reasons set forth above, supported by Exhibits A through H, Petitioner respectfully requests that this Honorable Court immediately grant the following relief:

Issue an Immediate Temporary Restraining Order enjoining Respondents, their agents, employees, and all persons acting in concert with them, from removing or attempting to remove Petitioner from the United States until further order of this Court;

Issue an Immediate Stay of Removal, effective upon the filing of this Motion, pursuant to the Court's authority under 28 U.S.C. § 2241, 28 U.S.C. § 1651(a), and Fed. R. Civ. P. 65(b);

Order Respondents to file any opposition within seventy-two (72) hours of the issuance of the Court's TRO, or within such time as the Court deems appropriate;

Order Respondents not to transfer Petitioner from the Middle District of Louisiana, or from his current place of confinement, without first obtaining leave of this Court;

Order Respondents not to move, transport, or otherwise relocate Petitioner outside of his current facility without providing Petitioner and this Court with immediate written notice, and without this Court's express authorization;

Order Respondents to return Petitioner's confiscated legal and VA medical files, including all materials seized during the September 10, 2025 removal attempt, and to make these materials available for litigation in this case and in his pending BIA appeal;

Order Respondents to preserve all evidence, including records, documents, electronic communications, and internal directives related to the September 10, 2025 removal attempt, the confiscation of Petitioner's legal file, the service of Form I-294 on November 18, 2025 (Exhibit A), and all other removal planning related to Petitioner;

Set this matter for a prompt preliminary-injunction hearing, following Respondents' filing of an opposition;

Declare that removal during the pendency of Petitioner's BIA appeal (Exhibit B) would violate 8 C.F.R. § 1003.6(a), due process, and this Court's jurisdiction under 28 U.S.C. § 2241;

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Grant such other and further relief as this Court deems just, proper, and necessary to preserve judicial review, prevent irreparable harm, and protect the life, rights, and constitutional interests of Petitioner, a United States Army veteran.

Respectfully submitted,

Gardy Gregory Alexandre



Petitioner, Pro Se

A#  | ID# 

Camp 57 ICE Processing Center

17544 Tunica Trace

Angola, Louisiana 70712

**4. PROPOSED TEMPORARY RESTRAINING ORDER**

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF LOUISIANA

GARDY GREGORY ALEXANDRE,

Petitioner,

v.

KEVIN JORDAN, Warden, Camp 57 ICE Processing Center;

PAM BONDI, Attorney General of the United States;

KRISTI NOEM, Secretary, Department of Homeland Security;

TODD LYONS, Acting Director, ICE;

FIELD OFFICE DIRECTOR, ICE/OAKDALE;

CHIEF COUNSEL, OPLA NEW ORLEANS;

UNITED STATES ATTORNEY, M.D. LA., Respondents.

Case No.: \_\_\_\_\_

**PROPOSED TEMPORARY RESTRAINING ORDER**

This matter comes before the Court on Petitioner Gardy Gregory Alexandre's Emergency Motion for Temporary Restraining Order and Immediate Stay of Removal. The Court has reviewed the Motion, supporting exhibits, and applicable law.

Based on the record before it, the Court finds:

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Petitioner has demonstrated a likelihood of success on the merits, given the mandatory stay of removal under 8 C.F.R. § 1003.6(a) and the pendency of his BIA appeal, documented in Exhibit B;

Petitioner has shown that he faces immediate and irreparable harm absent a TRO, as evidenced by the Form I-294 "Warning to Alien Ordered Removed or Deported" served on November 18, 2025 (Exhibit A), the September 10, 2025 attempted removal (Exhibit E), and the confiscation of his legal/medical files (Exhibit F);

The balance of equities strongly favors Petitioner, as removal during a mandatory stay is unlawful and would moot both his appeal and this Court's habeas jurisdiction;

The public interest is served by ensuring compliance with federal law, preserving judicial review, and preventing unlawful removal of a United States Army veteran;

Immediate relief is necessary to prevent a jurisdiction-destroying fait accompli and to preserve the status quo until the Court can fully consider the Petition and Motion. Accordingly,

IT IS ORDERED THAT:

Respondents are IMMEDIATELY ENJOINED from removing, deporting, or attempting to remove Petitioner Gardy Gregory Alexandre from the United States until further order of this Court.

Respondents shall not transfer Petitioner from the Middle District of Louisiana or from Camp 57 ICE Processing Center without prior leave of this Court.

Respondents shall not move or transport Petitioner to any other facility or location without providing written notice to this Court and to Petitioner immediately.

Respondents shall IMMEDIATELY return Petitioner's confiscated legal and VA medical files, including all documents taken during the September 10, 2025 removal attempt.

Respondents shall preserve all evidence, records, communications, and documents related to Petitioner's removal, including events occurring on September 10, 2025 and November 18, 2025.

This Temporary Restraining Order takes effect immediately and shall remain in effect until further order of this Court.

The Court will separately issue an Order to Show Cause setting a briefing schedule and hearing.

Signed this \_\_\_\_ day of \_\_\_\_\_, 2025, at \_\_\_\_\_.

UNITED STATES DISTRICT JUDGE

Middle District of Louisiana

## CERTIFICATE OF SERVICE


I hereby certify that on this 21 day of November, 2025, I placed in the institutional mail system, with proper postage, true and correct copies of all filings, exhibits (A-H), TRO, OSC, and documents associated with my pending 28 U.S.C. § 2241 petition.

Served on:

1. Warden Kevin Jordan, Camp 57 ICE Processing Center, Angola, LA
2. Attorney General Pam Bondi, DOJ, Washington, DC
3. Secretary Kristi Noem, DHS, Washington, DC
4. Acting Director Todd Lyons, ICE HQ, Washington, DC
5. ICE Field Office Director, Oakdale, LA
6. Chief Counsel, OPLA New Orleans, LA
7. U.S. Attorney, Middle District of Louisiana

Executed at Angola, Louisiana, on this 21 day of November, 2025.

Gardy Gregory Alexandre

  
Petitioner, Pro Se