

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

ABDOUL KARIMOU DIALLO,

Petitioner,

v.

DONALD J. TRUMP, *et al.*,

Respondents.

Civil Action No. 1:25-cv-2012

Judge Jerry Edwards, Jr.

Magistrate Judge Joseph H L Perez-
Montes

**MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY
INJUNCTION**

Petitioner Abdoul Karimou Diallo 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, his detention by Respondents is unlawful.

Petitioner therefore requests an order enjoining Respondents from further detaining him. Respondents oppose this motion.

Counsel for Respondents have appeared in this matter and will receive notice of this motion while formal service of process is pending.

Dated: December 19, 2025

Respectfully submitted,

/s/ Charles Andrew Perry

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Attorneys for Petitioner
** Pro hac vice*
***Pro hac vice pending*

CERTIFICATE OF SERVICE

I certify that I filed this Motion with the Clerk of Court via the CM/ECF system on
December 19, 2025.

/s/ Charles Andrew Perry