

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

R.C.A., a minor, by and through her Next
Friend, K.I.A.G.,

Plaintiff-Petitioner,

v.

Robert F. KENNEDY, JR. in his
official capacity as Secretary of
Health and Human Services; Angie
SALAZAR, in her official capacity
as Acting Director of the Office for
Refugee Resettlement; Alex
ADAMS, in his official capacity as
Assistant Secretary of the
Administration for Children and
Families; Randi CAVALLARO, in
her official capacity as Executive
Director of Children's Community
Programs of Connecticut; U.S.
Department of Health and Human
Services (HHS); U.S. Office of
Refugee Resettlement (ORR);
Administration for Children and
Families; Children's Community
Programs of Connecticut,

Defendant-Respondents.

Civil Case No.: 3:26-cv-00390 (KAD)

**PLAINTIFF-PETITIONER'S MOTION FOR A TEMPORARY RESTRAINING
ORDER AND PRELIMINARY INJUNCTION**

Pursuant to Fed. R. Civ. P. 65 (a) and (b), Plaintiff-Petitioner moves for immediate entry of a temporary restraining order directing the Defendant-Respondents to release from their custody forthwith R.C.A., a 5-year-old child, and to place her in the custody of her mother, Ms. K.I.A.G.. The Plaintiff-Petitioner also moves for a preliminary injunction for the same purpose.

As detailed in the attached memorandum and in the Plaintiff-Petitioner's Petition for a Writ

of Habeas Corpus and Complaint for Injunctive and Declaratory Relief (Dkt. No. 1), R.C.A. has been in the custody of the Office of Refugee Resettlement (“ORR”) for over 116 days. The Defendant-Respondents’ prolonged detention and separation of R.C.A. from her mother and family violate her constitutional, statutory, and regulatory rights, constituting irreparable harm. Each day that R.C.A. remains in Defendant-Respondents’ custody, she continues to suffer trauma and harm to her emotional, developmental, psychological, and educational well-being, with significant relational and attachment consequences.

Undersigned counsel has served all pleadings in the above-captioned matter by electronic mail on Assistant United States Attorney Michelle McConnaghy. Further, undersigned counsel has provided Attorney McConnaghy with advance notice of the Plaintiff-Petitioner’s intent to file the instant motion, and is serving on Attorney McConnaghy via electronic mail copies of the instant motion and accompanying memorandum at the time of filing. Likewise, copies of all pleadings in the above-captioned matter have been hand delivered to Defendant-Respondent Children’s Program of Connecticut, as will be copies of the instant motion and accompanying memorandum.

WHEREFORE, the Plaintiff-Petitioner respectfully requests that the Court enter a temporary restraining order directing the Defendant-Respondents to release R.C.A. from their custody immediately, without restraints on her liberty, and to place her in the custody of her mother, Ms. K.I.A.G. Further, The Plaintiff-Petitioner moves for a preliminary injunction for the same purpose.

Dated: March 17, 2026

Respectfully submitted,

By: /s/ Christopher M. Mattei
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Families; Children's Community
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Defendant-Respondents.

PROPOSED ORDER

Upon consideration of Plaintiff-Petitioner's Motion for a Temporary Restraining Order and Preliminary Injunction and the supporting memorandum, it is hereby:

ORDERED that the Motion for a Temporary Restraining Order is GRANTED;

It is further ORDERED that the above-captioned Defendant-Respondents are to release forthwith upon entry of this order the minor R.C.A., whose identity is known to the Defendant-

Respondents and who is currently in the custody of The Children's Community Project, in New Haven, Connecticut, to the custody of R.C.A.'s mother, Ms. K.I.A.G. The minor child R.C.A. shall be released to Ms. K.I.A.G. without any restraints on her liberty.

SO ORDERED this _____ day of March 2026.

HON. KARI A. DOOLEY
UNITED STATES DISTRICT JUDGE