

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
COLUMBUS DIVISION

---

Y.A.P.A., PLAINTIFF : 4:25-CV-00144-CDL  
VS. : MAY 01, 2025  
TRUMP ET AL., DEFENDANTS : COLUMBUS, GEORGIA

---

TRANSCRIPT OF EMERGENCY TRO HEARING  
BEFORE THE HONORABLE CLAY D. LAND,  
UNITED STATES DISTRICT JUDGE

APPEARANCES:

FOR THE GOVERNMENT:

ROGER C. GRANTHAM, ASSISTANT UNITED STATES ATTORNEY, MIDDLE  
DISTRICT OF GEORGIA, COLUMBUS DIVISION  
EMAIL: ROGER.GRANTHAM@USDOJ.GOV.

FOR THE DEFENDANT:

DANIE GALINDO 125 BROAD ST 18TH FL NEW YORK, NY 10004  
646-905-8907 EMAIL: D GALINDO@ACLU.ORG  
PRO HAC VICE ATTORNEY TO BE NOTICED

---

JOAN DRAMMEH, CVR, CCR

JOAN\_DRAMMEH@GAMD.USCOURTS.GOV

1 Thursday, May 01, 2025 08:44:13

2 --- **PROCEEDINGS** ---

3 COURTROOM DEPUTY: Good morning everyone, Judge Land  
4 is on the line.

5 THE COURT: I want to first of all make sure that I  
6 have a list of who is going to be speaking. Mr. Gunn, do you  
7 already have a list of everybody that's participating for the  
8 parties?

9 COURTROOM DEPUTY: I do Judge, yes.

10 THE COURT: I just need a list of who is going to be  
11 speaking. First of all for the Petitioner. Let me just hear  
12 from them, whoever they are.

13 MR. GALINDO: Thank you Your Honor. This is Daniel  
14 Galindo for the Petitioner from the ACLU. Please let me know  
15 if you have any issues hearing me.

16 THE COURT: How do you spell your last name?

17 MR. GALINDO: It's G-A-L-I-N-D-O.

18 THE COURT: All right Galindo.

19 MR. GALINDO: Yes, exactly.

20 THE COURT: And who is going to be speaking for the  
21 Defendants?

22 MR. GRANTHAM: Your Honor, this is Roger Grantham  
23 from the U.S. Attorney's Office for the Middle District of  
24 Georgia and I will speaking on behalf of the Respondent  
25 Defendants.

9:05:34AM 1

THE COURT: All right, I have read the petition and motion and as I understand it basically the Petitioner is seeking to have an order that he not be transferred while he is provided with a meaningful opportunity to contest the Government's potential designation of him as an enemy alien. What's the Government's response to that Mr. Grantham? Are you going to oppose any order that would prevent a transfer until a determination is made as to whether he's going to be designated and then that designation is his opportunity to contest it?

11 MR. GRANTHAM: Your Honor, our position is that we do oppose a transfer. I'm happy to provide a reasoning behind that if you want us to clarify.

14 THE COURT: Let me make sure I understand it. You just said that you do oppose transfer; that's not correct is it?

17 MR. GRANTHAM: My apologies. Our position is that we oppose any kind of injunction or TRO that would prohibit the transfer.

20 THE COURT: As I understand it this particular Petitioner has not yet been designated as an enemy alien under the present proclamation and under the statute; is that correct Mr. Grantham?

24 MR. GRANTHAM: That's correct Your Honor. I evaluated the Petitioner. He has not been processed under the

9:07:30AM 1

Alien Enemies Act.

2 THE COURT: Is it likely that he will be?

3 MR. GRANTHAM: Your Honor, at this time I can't  
4 state with any kind of certainty as to my position on future  
5 designation given the short turnaround. What I will say is  
6 that the petitioner is currently in removal proceedings under  
7 the standard provision of Immigration and Nationality Act with  
8 an active charge of removability, and undergone a bond  
9 hearing, and has undergone several other hearings in those  
10 proceedings. So the Government's position is that he at this  
11 time is detained under the standard provisions of the  
12 Immigration and Nationality Act; and that any claim regarding  
13 the future potential possible designation under the AEA would  
14 be speculative at best and would not warrant any kind of  
15 release at this point.

16 THE COURT: The other thing is if the Government  
17 makes that designation and decides to transfer him or deport  
18 him based upon that designation and not based upon his other  
19 circumstances that would authorize deportation. What is the  
20 Government's plan to give him an opportunity to contest his  
21 removal based upon being an enemy alien?

22 MR. GRANTHAM: Your Honor, if that designation were  
23 to occur -- which again to reiterate has not -- the petition  
24 states that there are procedures which would be in place;  
25 which would include the issuance of a notice to the Petitioner

9:09:48AM 1 of his designation and then an opportunity to file a habeas  
2 petition thereafter; which would at that point -- My  
3 understanding is that he would not be removed during the  
4 pendency of that petition should it be filed because that is  
5 the mechanism by which the designation is evaluated.

6 THE COURT: So if there is a designation of the  
7 Petitioner as an enemy alien, and if the Government seeks to  
8 have him removed from the country based upon that designation,  
9 then the Government agrees that before you can transfer him he  
10 would be entitled to a hearing on whether that is a valid  
11 basis for his removal. Obviously, that's what the Supreme  
12 Court decision says; correct?

13 MR. GRANTHAM: Your Honor, we would agree that the  
14 Supreme Court's decision states that habeas is a mechanism by  
15 which an AEA designee may challenge that designation and any  
16 enforcement of that designation as far as how that impacts the  
17 transfer given that at this time Petitioner has not been  
18 designated.

19 THE COURT: That's not what I'm asking. That's not  
20 what I am asking Mr. Grantham. I am asking if the Government  
21 in this case decides, for example, that they want to speed  
22 this up. They don't want to rely solely on the standard  
23 deportation process for deporting him and they also when they  
24 transfer him want to transfer him to a location that has been  
25 set aside for enemy aliens. Before the Government can

9:12:17AM 1 implement that kind of transfer, does the Government agree in  
2 light of the Supreme Court's recent decision that he has the  
3 right to meaningful judicial review of that decision? Does  
4 the Government not conceded that at this point?

5 MR. GRANTHAM: Your Honor, the Government's position  
6 is I think it comes down to we are discussing a transfer, for  
7 example, either one within the United States to another  
8 facility or --

9 THE COURT: I'm talking about a transfer from the  
10 Middle District that would deprive the court of jurisdiction  
11 over his habeas petition contesting his enemy alien status.

12 MR. GRANTHAM: Your Honor, on that point at this  
13 time I'm not able to state specifically the Respondent's  
14 position on a transfer solely based on the AEA but I will  
15 repeat that he will, if he is designated under the AEA,  
16 wherever he is located at that time; he would have pursuant to  
17 the Supreme Court's order the opportunity to file the habeas  
18 petition in whichever jurisdiction he is in to challenge that  
19 designation, again, assuming that that occurs at some point in  
20 the future. As far as right now --

21 THE COURT: You agree that the Government cannot  
22 transfer him outside of the United States until a  
23 determination is made on a habeas petition if one is filed.

24 MR. GRANTHAM: Your Honor, if the question is if he  
25 is designated and he does file the petition within the time

9:14:40AM 1 period required -- If the question is whether he can then be  
2 removed once that petition is filed, my understanding is that  
3 once the petition is filed he would not be removed until  
4 there's a resolution.

5 THE COURT: What is the Government's position then  
6 as to the process that will be afforded to the Plaintiff in  
7 order for him to be able to file his habeas petition and have  
8 it meaningfully heard before he's removed.

9 MR. GRANTHAM: Your Honor, the Government's position  
10 is that the process the Petitioner described in the petition  
11 would comply with any requirements for due process or  
12 otherwise under the standard set forth in their claims.  
13 However, the Respondent's position is that the Court need not  
14 address that question, indeed cannot address that question, at  
15 this point because Petitioner is not subject to the AEA, has  
16 not been designated. Therefore any analysis of what those  
17 procedures as applied to him could look like could effectively  
18 be an aside opinion because there's no standing. Petitioner  
19 lacks standing as to any of those claims challenging the AEA  
20 or its procedures because he's not subject to the AEA at this  
21 time.

22 THE COURT: What if the Court finds that it is  
23 substantially likely based on the present record that he is  
24 going to be so designated and therefore if he is so  
25 designated, then before he is transferred then he needs to be

9:16:49AM 1 given a meaningful opportunity? The problem here I think  
2 Mr. Grantham -- it's clear to me the Government understands  
3 this and does not necessarily see it as a problem -- but the  
4 issue is the executive branch arguably should not be able to  
5 determine solely what constitutes due process rights to  
6 contest such a designation and then be able to deprive the  
7 Court of any judicial review which the Supreme Court has said  
8 is required by having a truncated or very abbreviated  
9 contested review period that may or may not satisfy due  
10 process. But being able to avoid judicial review by  
11 transferring after that process that has not been subject to  
12 judicial review.

13 In other words, if the Government comes in and says  
14 okay the Supreme Court now says he has got a right to file a  
15 habeas petition if you designate him, but if you designate --  
16 and I'm just giving an extreme example -- if you designate him  
17 at midnight on a particular day and you tell him you've got  
18 until 2:00 a.m. to file a habeas petition; and then at 2:05  
19 a.m. he has not filed it you ship him off to El Salvador.

20 He has not had a meaningful opportunity to have  
21 judicial review of that determination and, yet, once he's  
22 transferred to El Salvador no federal court will have  
23 jurisdiction to review your decision. So it seems to me that  
24 there needs to be some protection in place to implement what  
25 the Supreme Court has said is a right to meaningful review.

9:19:25AM 1 If the Government or executive branch is not going to  
2 stipulate as to what that review will be, though the Court can  
3 make some assessment on the front end as to whether it will be  
4 adequate, then the only remedy that the Petitioner has is to  
5 ask for any transfer be staid until the Court can make that  
6 review.

7 The temporary restraining order, if there's been no  
8 designation of him as an enemy alien, it would simply be  
9 maintaining the status quo. It would say, okay, he's not  
10 enemy alien and he will not be transferred on that basis until  
11 it is determined that he is so designated and he has had an  
12 opportunity to contest it. I think the Government probably  
13 knows right now whether they are going to designate him, maybe  
14 not. Is it your position the Government has no idea whether  
15 they are going to designate him Mr. Grantham?

16 MR. GRANTHAM: Your Honor, my understanding at this  
17 time is that the immigration authorities, Immigration Customs  
18 Enforcement, has evaluated the petitioner and he has not been  
19 processed under the AEA. The AEA has not --

20 THE COURT: What does that mean? What's the  
21 difference between processed and a decision has not been made  
22 as to whether he would qualify as an enemy alien? In other  
23 words, if you mean by he's not been processed there's not been  
24 the designation required under the statute that's one thing.  
25 But has a determination been made that he qualifies as an

9:21:39AM 1

enemy alien and the Government intends to proceed with the  
2 process of having him so designated?

3 MR. GRANTHAM: Your Honor, just to clarify, my  
4 understanding is that he was evaluated by ICE and afterwards  
5 was not designated under the AEA. As far as whether the  
6 Government could hypothetically in the future designate him, I  
7 am hesitant to speculate without conferring with my client  
8 specifically about that hypothetical scenario. But to my  
9 knowledge --

10 THE COURT: Okay, so he has not been so designated  
11 so if the Court ordered him not to be transferred based upon a  
12 designation as an enemy alien until he has had a meaningful  
13 opportunity to get judicial review of that decision; there  
14 would be no harm whatsoever to the Government, correct.

15 MR. GRANTHAM: No, Your Honor. Because Petitioner  
16 is currently in removal proceedings not under the AEA but  
17 under the Immigration and Nationality Act, ICE's authority to  
18 dictate or determine the location of detention is committed to  
19 its discretion. And that discretionary determination is  
20 protected from judicial review under Title 8 so it's  
21 hypothetically -- We're operating into hypothetical in that he  
22 may in the future be designated and that's a different case if  
23 we have an individual who already has been designated as to  
24 what remedy would be a place, or needs to be in place, for  
25 that individual.

9:23:32AM 1 But in a circumstance like this where there is no  
2 designation, the Petitioner freely admits that in the petition  
3 and is subject to an unchallenged -- They state they don't  
4 challenge his detention currently or his removal proceedings,  
5 then ICE has the authority to transfer him for a variety of  
6 reasons that are totally unrelated to any potential  
7 designation under the AEA; which again that is speculative as  
8 to whether that would even occur.

9 In other words, there's no injury at this time that  
10 is irreparable or even a substantial threat the Petitioner can  
11 show that a stay of the transfer would remedy.

12 THE COURT: So your contention is that there would  
13 be no authority for the Court to grant any relief based upon  
14 the possibility of his being designated an enemy alien; that  
15 the only time the Court could enter any relief in that regard  
16 would be once he is so designated, is that correct?

17 MR. GRANTHAM: Your Honor, I believe that's correct.  
18 If our position is that any analysis of either the AEA writ  
19 large, in other words, whether it violates any of the various  
20 standards in its promulgation itself that Petitioner  
21 described, or any application of the AEA as to him, or any  
22 application of the AEA as to Petitioner; all of those  
23 questions at this point are entirely speculative. There's no  
24 indication that he can show standing as to any of those claims  
25 to this point because he has not been designated under the

9:25:53AM 1

AEA.

2 THE COURT: If he, in fact, has to wait until he is  
3 designated then what opportunity does he have to contest that  
4 designation before he is removed from the country?

5 MS. SHOEMAKER: Your Honor, I would --

6 THE COURT: If there's no court order in place that  
7 says either he can't be removed until he is given an  
8 opportunity to contest it or no court order in place that says  
9 this is the process, the minimum process that constitutes the  
10 meaningful review that the Supreme Court said is necessary;  
11 how does the Petitioner obtain that type of relief if he has  
12 to wait until after he is designated?

13 If there's nothing in the statute that says, okay,  
14 after you are designated -- if it just says -- you're entitled  
15 to meaningful review to contest a decision; how is he able to  
16 contest that if the Government says after he's designated,  
17 okay, here's your notice -- you've got two hours? You don't  
18 file a petition you're gone. How does the Court protect  
19 against that happening?

20 MS. SHOEMAKER: Your Honor, at this time --

21 THE COURT: That would certainly thwart the Supreme  
22 Court's decision that says he's entitled to meaningful  
23 judicial review. They certainly didn't intend to just say,  
24 okay, you can file a petition for habeas corpus and get it  
25 reviewed and that right not be meaningful.

9:28:18AM 1

MR. GRANTHAM: Your Honor, at this specific  
2 proceeding under the AEA, at this time we can certainly  
3 address that through the briefing and in consultation with my  
4 client as to those specific procedures. What I will say is  
5 that as you've mentioned the Supreme Court has stated that an  
6 AEA designee may file a habeas petition in the district of  
7 confinement after challenging is designation. And my  
8 understanding at this time is that once that is filed he would  
9 not be removed pursuant to the AEA. But --

10 THE COURT: No. I understand that. My question is  
11 that period of time between that designation and the time he  
12 files his habeas petition, that period there; which to me  
13 would go to whether or not the judicial review -- whether he  
14 has a meaningful opportunity for judicial review -- what  
15 determines that length of time in between designation and his  
16 right to file a petition?

17 MR. GRANTHAM: Your Honor, we're happy to submit --

18 THE COURT: It was seemed to be analogous to, at  
19 what point does a statute of limitation deny somebody due  
20 process. You couldn't say, okay, the statute of limitations  
21 for a personal injury case is six hours after you are injured;  
22 that doesn't give a person a meaningful opportunity to pursue  
23 their claim. So what is in place to make sure that he has  
24 this meaningful opportunity to have it reviewed? It seems to  
25 me the Supreme Court has clearly said these people have to be

9:30:20AM 1 given a meaningful opportunity and if the Government is not  
2 going to stipulate as to what that means with regard to how  
3 much time they've got between the designation and his right to  
4 file it than the process of notice to him, then the Court is  
5 going to have to decide that. I understand that there is some  
6 policy that he has got 12 hours; is that correct?

7 MR. GRANTHAM: Your Honor, I am hesitant to commit  
8 to what the actual procedures are. I am happy to go back to  
9 my client and perhaps brief this information. We're happy to  
10 submit it --

11 THE COURT: Well, let me nail this down. Am I  
12 correct that there is no current policy in place that covers  
13 that period between designation and the requirement that he  
14 file his petition; that there's no current policy in place  
15 that the Government believes that it is necessarily bound to?

16 MR. GRANTHAM: Your Honor, again, at this time I  
17 cannot give any specific information as to what the policy is.  
18 My understanding is that there --

19 THE COURT: Okay, you can't say today whether the  
20 Government may say to a Petitioner, you are designated as  
21 enemy alien. You have two hours to contest that decision.  
22 Otherwise, you will be removed based on that status. You  
23 can't say today whether the Government believes that would  
24 satisfy the Supreme Court's due process requirements or not.  
25 Am I understanding you correctly?

9:32:46AM 1

MR. GRANTHAM: Your Honor, my understanding is that  
2 there is a process in place. At this time cannot give  
3 information as to the particulars given the turnaround. We  
4 would welcome the opportunity to submit briefings, to submit  
5 --

6 THE COURT: Let me ask you this. Does the  
7 Government object to maintaining the status quo and having him  
8 not transferred from this district for that limited period of  
9 time while briefing is being completed?

10 MR. GRANTHAM: Your Honor, we do object.

11 THE COURT: What good does it do then to have the  
12 briefing done when the whole matter could be mooted by his  
13 removal during the briefing process?

14 MR. GRANTHAM: Your Honor, again he has not been  
15 designated. There is no, to my knowledge, no imminent  
16 removal.

17 THE COURT: I get. I get it Mr. Grantham. But the  
18 the problem is -- it seems to me -- that there is the  
19 potential for the whole matter to be mooted simply by the  
20 executive branch removing him in a manner that prevents  
21 judicial review of whether he got a meaningful opportunity to  
22 contest that basis for removal.

23 MR. GRANTHAM: Your Honor, I would respond with two  
24 points. First, that currently because he has not been  
25 designated that any kind of analysis of potential interaction

9:34:43AM 1 with AEA as to a transfer at this time, again, that is a  
2 potential for that to occur. But at the moment he is detained  
3 under Title 8 under the INA not under the AEA and the location  
4 of his detention, which includes the transfer, is  
5 discretionary; and that is protected specifically from  
6 judicial review is carved out for judicial review such that  
7 effectively at this point we would be invading upon on an area  
8 that the Congress has carved out from judicial review based on  
9 a potential hypothetical situation that has not occurred at  
10 this point.

11 The point second point is that if the basis for the  
12 claims is simply the potential to be designated under the AEA,  
13 then colorably that would provide standing to any non-citizen  
14 who could be designated or at least alleges that there is the  
15 potential to be under the AEA.

16 But the point of the standing requirement is that in  
17 order for them to present that claim -- in order for it to be  
18 a ripe claim that presents a colorable, imminent injury in  
19 fact -- they have to first be designated. Now, I understand  
20 the Court's -- I recognize -- I acknowledge the Court's  
21 concerns about the transfer but our position is that right now  
22 at this time as far as the TRO there is no substantial threat  
23 of irreparable injury which would require any TRO relief  
24 because he has not been designated under the AEA.

25 THE COURT: It's my understanding from petition

9:36:54AM 1 maybe this is not agreed to by the Government. They contend  
2 or he contends that the Government maintains that he is a  
3 member he's a member of the Tren De Aragua gang. Does the  
4 Government contend that?

5 MR. GRANTHAM: Your Honor, I'm not aware of what  
6 designation. All I'm aware of is that a Petitioner was  
7 evaluated by --

8 THE COURT: Mr. Grantham, I understand you're very  
9 careful as a lawyer but some of this is just hard to believe.  
10 There is this big push -- and I am not saying from a policy  
11 standpoint the president does not full discretion to do  
12 this -- but there's a big push to find a members of this Tren  
13 De Aragua gang, to round them up. As I understand it the  
14 State Department has designated that gang as a foreign  
15 terrorist organization and that the president in his  
16 proclamation is taking the position that members of that gang  
17 qualify as enemy aliens; and therefor they are subject to  
18 removal in an expedited manner from the United States; and are  
19 not required to go through the standard process under the  
20 immigration statute.

21 So if you've got a Petitioner here who the  
22 Government contends is a member of that gang, and who the  
23 Government in all likelihood intends to remove, or believe  
24 that they have a right to remove him in a more expedited  
25 manner than removing him through the traditional channels, and

9:39:13AM 1 they believe they have right to send him to a particular  
2 country not as a normal deportees but to be imprisoned in that  
3 country; then I don't see how the Court lacks authority to  
4 make a determination as to how he gets a meaningful  
5 opportunity to contest his designation as far as that gang.

6 I mean to hear you argue it all we've got here is a  
7 Petitioner who is not entitled to be in the United States and  
8 we are just going to deport him back to Venezuela. The  
9 Government certainly may have the right to do that, but if  
10 that's not -- If you've also got a parallel track within the  
11 process of processing him as a designated enemy alien and the  
12 Supreme Court has said that he has a meaningful opportunity to  
13 contest that before he is sent to the prison in El Salvador,  
14 then I think the Court has some authority to make sure that  
15 his opportunity to have that determination reviewed is  
16 meaningful.

17 Now, I agree the Court does not have the right  
18 necessarily to interfere with his normal deportation process.  
19 I guess the question is how to formulate an order that allows  
20 that to continue while he has an opportunity to contest his  
21 enemy alien status if that designation is ever made. If the  
22 Government stipulated that before we remove him based on enemy  
23 alien status, we're going to give him this meaningful  
24 opportunity to be heard. If the Government would stipulate as  
25 to what that is then it would simplify this process

9:41:55AM 1

substantially.

2

3

4

5

6

7

Mr. Galindo, the Government apparently claims that as the matter stands now your client has not been designated as an enemy alien. Therefore you can't obtain any relief based upon that designation because it would be speculative as to whether he will ever be so designated. What's your response to that argument?

8

9

10

11

12

13

14

15

16

17

18

19

MR. GALINDO: Your Honor, the Government has made a repeated that they allege TdA membership. I did not hear them focus on the I-213, the arrest report, but within that report as, Your Honor, noted it specifically says he was targeted for arrest by Homeland Security Investigation for being a known associate of TdA. And then it separately later says, "he has ties to the gang" TdA. That first allegation that, Your Honor, quoted earlier and the I-213 were submitted by the Government and relied upon both by the Government and the immigration judge in the bond hearing, the recent bond hearing; which our client's declaration makes clear is the moment that he learned of this allegation.

20

21

22

23

24

25

So the proclamation is clear about who is subject to it and the criteria. So there is very clearly a substantial threat to our client. It is far from speculative and I heard considerable hesitancy and uncertainty from the Government in terms of whether it could change its mind at the drop of a hat and so designate him.

9:43:57AM 1           And if that happens, Your Honor, I think mentioned  
2 he could be designated Friday at midnight and certainly gone  
3 by Sunday in a facility and at a time where in practical  
4 reality no one would be able to get a counsel call. As I  
5 understand they are not scheduled on the weekends besides the  
6 fact that there's obviously immense difficulties getting  
7 something turned around in that time.

8           THE COURT: What is your response to the argument  
9 that he is currently in the middle of deportation proceedings  
10 under the Immigration Naturalization Act and that if the Court  
11 ordered him not to be transferred from this district; that has  
12 the potential to interfere with their right to process him  
13 through the normal deportation channels because they may want  
14 to send him somewhere else as part of that process? The Court  
15 can't restrict that.

16           MR. GALINDO: Your Honor personally has the  
17 authority as, Your Honor, mentioned. I think the best next  
18 step is that while briefing is occurring and while the Court  
19 has the chance to evaluate and decide the various arguments  
20 just as a first step, the Court certainly has the power to  
21 freeze in place and allow it to be able to decide. Among the  
22 authorities there would certainly be the All Writs Act to  
23 preserve this Court's ability to decide that.

24           Yes, our client is in immigration court in Stewart.  
25 But the Government's position as I understand it is that the

9:46:16AM 1

AEA operated outside of the immigration laws. And so the harm that's being protected against here is a transfer elsewhere, a quick designation, and then finding himself in El Salvador in prison. I think, Your Honor, has the authority to take the limited step of enjoining transfer while, Your Honor, can receive briefing on these and other questions.

7 THE COURT: Let me ask you this Mr. Galindo. Are  
8 citizens of Venezuela still subject to temporary protected  
9 status? That's been removed by the current administration,  
10 correct?

11 MR. GALINDO: My understanding, Your Honor, the  
12 current administration has attempted to remove temporary  
13 protective status, and is currently the subject of  
14 litigation, and has a current pause on that revocation of  
15 temporary protective status across the board.

16 THE COURT: Let me ask you a slightly different  
17 question. Do you understand that Venezuela is now accepting  
18 their citizens for deportation purposes or not?

19 MR. GALINDO: My understanding is, yes.

20 THE COURT: Okay. Is your client willing to consent  
21 to deportation to Venezuela?

22 MR. GALINDO: No, Your Honor. As the declaration  
23 has made clear, he is pursuing asylum. He has timely filed  
24 asylum within a year of arrival to the country and has --  
25 [indecipherable]-- specifically, claims as to being removed to

9:48:36AM 1

Venezuela.

2

THE COURT: So he seeks to remain in the United States.

3

4

MR. GALINDO: That's right Your Honor. He is seeking the protections of our immigration laws and has proceedings ongoing in Stewart immigration court. And it's precisely hopping that track and immediately removing him despite ongoing proceedings that is exactly what the Government has done to the 137 Venezuelan men who are in the prison in El Salvador known for torture and abuse. It's exactly in that posture as we understand it that many of the men sent to that prison were in. They were pursuing and had ongoing immigration proceedings and did not have final orders of removal.

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

THE COURT: Mr. Grantham, perhaps you have not had an opportunity to review this since it was just filed yesterday I guess. If the Court were not satisfied based on the present record that at this time there's a substantial likelihood that the Petitioner will prevail on his habeas petition, but the Court believed that the Petitioner has the right to contest this designation in the future as an enemy alien; what is the Government's position as to whether the Court is not authorized to grant a Temporary Restraining Order? It would be authorized under the All Writs Act to craft a remedy that maintains the status quo until the briefing could be completed

9:51:04AM 1 on these issues. Do you have any position with regard to the  
2 applicability of the All Writs Act if the elements of the  
3 temporary restraining order are not met?

4 MR. GRANTHAM: Your Honor, I would like to preface  
5 this with I would like to respond to some of the allegations  
6 that Petitioner's Counsel raised. Directly to answer Your  
7 Honor's question, at this time we have no position -- Well, I  
8 am not authorized given the timing of this to state  
9 specifically our position as to whether the All Writs Act  
10 might offer some kind of alternative to the TRO as we believe  
11 that Petitioner cannot satisfy that TRO standard.

12 We are happy to brief that question but I think that  
13 our general position on this point is the Court would like we  
14 can certainly discuss a briefing schedule on the allegations,  
15 and the arguments, and claims raised in the petition. But  
16 without a current designation any TRO concerning potential  
17 operation of the AEA that has not been undertaken at this time  
18 would not satisfy the TRO standard.

19 As to Your Honor's questions about Petitioner's  
20 immigration status, our understanding is that Petitioner is  
21 not a TPS beneficiary. Our understanding is that he's  
22 currently in removal proceedings on a charge of removability  
23 that is unrelated to the AEA. That his charges for unlawful  
24 entry I believe and that he is litigating that claim with  
25 counsel in the immigration court currently.

9:53:12AM 1

Further, I believe Petitioner's Counsel is correct  
2 that Venezuela is accepting non-citizens for removal. And I  
3 believe that this Court has pending cases where individuals  
4 have been removed to Venezuela within the last few months.  
5 But as directly to the question of whether or not -- Let me  
6 backtrack. Our position at this time we are happy to discuss  
7 a briefing schedule on the merits and to address through  
8 declarations or briefing the questions the Court has and the  
9 questions presented by the petition. But since we are here  
10 for the purpose of a TRO that there is no -- Petitioner cannot  
11 show a substantial likelihood of success --

12 THE COURT: What would be a reasonable time for the  
13 Defendants or Respondents to submit a brief in response to the  
14 TRO?

15 MR. GRANTHAM: Your Honor, if we could submit it --  
16 I think if we could --

17 THE COURT: Tell me how much time you need. I am  
18 not rushing you because what I'm likely going to do is  
19 maintain the status quo during the briefing schedule. So how  
20 much time do you want?

21 MR. GRANTHAM: Your Honor, 14 days from filing,  
22 which would be 14 days from yesterday, which would be May  
23 14th.

24 THE COURT: Mr. Galindo, you could respond within  
25 seven days; correct?

9:55:11AM 1

MR. GALINDO: Yes, Your Honor.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

THE COURT: This is what I am going to do. I am going to order that the Petitioner not be transferred from the Middle District of Georgia during the pendency of the briefing schedule on the present motion for the temporary restraining order, which now I guess could be comforted to preliminary injunction since the Defendants have had an opportunity to be heard to some extent -- and will have a full opportunity to be heard -- that he not be transferred until further order of the Court; which will probably mean that the Court will clarify in written order that he will not be transferred until after the briefing has been completed and the Court has had an opportunity to rule on the motion for temporary restraining order; which will be done properly after the briefing is complete. The Court finds that it has the authority to prevent his transfer for this limited period of time under the All Writs Act. I'm not finding today that there is a substantial likelihood that the Petitioner would prevail on his underlying petition for habeas corpus. Is that order clear Mr. Grantham that he shall not be transferred until further order of the Court?

MR. GRANTHAM: Yes, Your Honor, that's clear.

THE COURT: Mr. Galindo, is there anything else you wish to add at this point?

MR. GALINDO: Not with respect to that order, Your

9:57:19AM 1

Honor. There is the matter of the pseudonym motion that --

2

THE COURT: Any objection to this pseudonym motion

3

Mr. Grantham?

4

MR. GRANTHAM: Your Honor, given the circumstances

5

our focus was on the TRO. I will have to confer with my

6

client as to the particular position, but my understanding is

7

that they generally they oppose the motion to proceed under

8

pseudonym. But like I said as to the particular grounds I

9

will have to confer with them as to that.

10

THE COURT: All right. Is there any particular

11

concern with allowing the case to proceed based on the

12

pseudonym until after you have briefed that issue?

13

MR. GRANTHAM: No, Your Honor. We are happy to

14

proceed using the pseudonym until briefing can be completed on

15

the motion to proceed under the pseudonym.

16

THE COURT: We will do that. The briefing schedule

17

on the motion to proceed under the pseudonym will be the same

18

as the briefing motion on the TRO, and the briefing schedule

19

on the TRO. It will just have the same due dates.

20

MR. GRANTHAM: Yes, Your Honor.

21

THE COURT: Mr. Galindo, anything else you wanted to

22

add?

23

MR. GALINDO: Nothing further from Petitioner.

24

Thank you.

25

THE COURT: Mr. Grantham.

9:58:58AM 1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

MR. GRANTHAM: No, Your Honor.

THE COURT: Okay. Thank you all for being available on such short notice. I will decide this promptly after the briefing schedule is completed. Have a good rest of the week.

[END OF RECORD]

9:59:13AM 1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

CERTIFICATE OF OFFICIAL REPORTER

I, JOAN DRAMMEH, Federal Official Court Reporter, in and for the United States District Court for the Middle District of Georgia, do hereby certify that the foregoing is a true and correct transcript to the best of my knowledge and ability from the telephone conference recording provided in the above-entitled matter and that the transcript page format is in conformance with the regulations of the Judicial Conference of the United States.

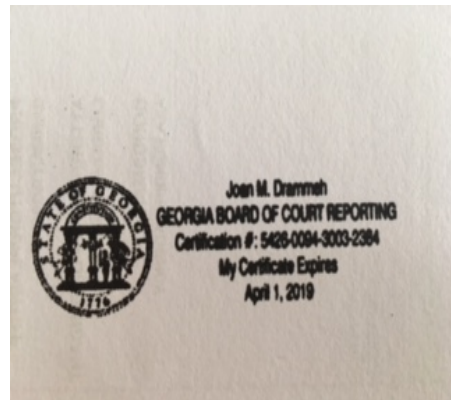
Dated this 5th day of May, 2025

*Joan Drammeh*

JOAN DRAMMEH

Federal Official Court Reporter

MY COMMISSION EXPIRES:  
APRIL 1, 2025



COURTROOM DEPUTY: [2] 2/3 2/9  
 MR. GALINDO: [12] 2/13 2/17 2/19  
 19/8 20/16 21/11 21/19 21/22 22/4  
 25/1 25/25 26/23  
 MR. GRANTHAM: [32]  
 MS. SHOEMAKER: [2] 12/5 12/20  
 THE COURT: [48]

**0**

01 [2] 1/5 2/1  
 08:44:13 [1] 2/1

**1**

10004 [1] 1/19  
 12 [1] 14/6  
 125 [1] 1/19  
 137 [1] 22/9  
 14 [2] 24/21 24/22  
 14th [1] 24/23  
 18TH [1] 1/19

**2**

2025 [3] 1/5 2/1 28/12  
 213 [2] 19/10 19/15  
 2:00 a.m [1] 8/18  
 2:05 [1] 8/18

**4**

4:25-CV-00144-CDL [1] 1/4

**5**

5th [1] 28/12

**6**

646-905-8907 [1] 1/20

**8**

8907 [1] 1/20

**A**

a.m [2] 8/18 8/19  
 abbreviated [1] 8/8  
 ability [2] 20/23 28/7  
 able [8] 6/13 7/7 8/4 8/6 8/10 12/15  
 20/4 20/21  
 about [5] 6/9 10/8 16/21 19/20 23/19  
 above [1] 28/8  
 above-entitled [1] 28/8  
 abuse [1] 22/10  
 accepting [2] 21/17 24/2  
 acknowledge [1] 16/20  
 ACLU [1] 2/14  
 ACLU.ORG [1] 1/20  
 across [1] 21/15  
 Act [10] 4/1 4/7 4/12 10/17 20/10 20/22  
 22/24 23/2 23/9 25/17  
 active [1] 4/8  
 actual [1] 14/8  
 add [2] 25/24 26/22  
 address [4] 7/14 7/14 13/3 24/7  
 adequate [1] 9/4  
 administration [2] 21/9 21/12  
 admits [1] 11/2  
 AEA [27] 4/13 5/15 6/14 6/15 7/15 7/19  
 7/20 9/19 9/19 10/5 10/16 11/7 11/18  
 11/21 11/22 12/1 13/2 13/6 13/9 16/1  
 16/3 16/12 16/15 16/24 21/1 23/17  
 23/23  
 afforded [1] 7/6

after [10] 8/11 12/12 12/14 12/16 13/7  
 13/21 25/11 25/14 26/12 27/3  
 afterwards [1] 10/4  
 again [6] 4/23 6/19 11/7 14/16 15/14  
 16/1  
 against [2] 12/19 21/2  
 agree [4] 5/13 6/1 6/21 18/17  
 agreed [1] 17/1  
 agrees [1] 5/9  
 AL [1] 1/6  
 alien [18] 3/5 3/21 4/1 4/21 5/7 6/11 9/8  
 9/10 9/22 10/1 10/12 11/14 14/21  
 18/11 18/21 18/23 19/4 22/21  
 aliens [2] 5/25 17/17  
 all [15] 2/5 2/11 2/18 3/1 11/22 17/6  
 17/23 18/6 20/22 22/24 23/2 23/9  
 25/17 26/10 27/2  
 allegation [2] 19/14 19/19  
 allegations [2] 23/5 23/14  
 allege [1] 19/9  
 alleges [1] 16/14  
 allow [1] 20/21  
 allowing [1] 26/11  
 allows [1] 18/19  
 already [2] 2/7 10/23  
 also [2] 5/23 18/10  
 alternative [1] 23/10  
 am [12] 5/20 5/20 10/7 14/7 14/8 14/11  
 14/25 17/10 23/8 24/17 25/2 25/2  
 Among [1] 20/21  
 analogous [1] 13/18  
 analysis [3] 7/16 11/18 15/25  
 another [1] 6/7  
 answer [1] 23/6  
 any [29]  
 anything [2] 25/23 26/21  
 apologies [1] 3/17  
 apparently [1] 19/2  
 APPEARANCES [1] 1/12  
 applicability [1] 23/2  
 application [2] 11/21 11/22  
 applied [1] 7/17  
 Aragua [2] 17/3 17/13  
 are [23] 2/12 3/6 4/24 6/6 9/13 9/15  
 11/6 11/23 12/14 13/21 14/8 14/20  
 17/17 17/18 18/8 20/5 21/7 22/9 23/3  
 23/12 24/6 24/9 26/13  
 area [1] 16/7  
 arguably [1] 8/4  
 argue [1] 18/6  
 argument [2] 19/7 20/8  
 arguments [2] 20/19 23/15  
 around [1] 20/7  
 arrest [2] 19/10 19/12  
 arrival [1] 21/24  
 as [70]  
 aside [2] 5/25 7/18  
 ask [4] 9/5 15/6 21/7 21/16  
 asking [3] 5/19 5/20 5/20  
 assessment [1] 9/3  
 ASSISTANT [1] 1/14  
 associate [1] 19/13  
 assuming [1] 6/19  
 asylum [2] 21/23 21/24  
 at [38]  
 attempted [1] 21/12  
 ATTORNEY [2] 1/14 1/21  
 Attorney's [1] 2/23  
 authorities [2] 9/17 20/22  
 authority [8] 10/17 11/5 11/13 18/3

18/14 20/17 21/4 25/15  
 authorize [1] 4/19  
 authorized [3] 22/23 22/24 23/8  
 available [1] 27/2  
 avoid [1] 8/10  
 aware [2] 17/5 17/6

**B**

back [2] 14/8 18/8  
 backtrack [1] 24/6  
 based [14] 4/18 4/18 4/21 5/8 6/14  
 7/23 10/11 11/13 14/22 16/8 18/22  
 19/5 22/17 26/11  
 basically [1] 3/2  
 basis [4] 5/11 9/10 15/22 16/11  
 be [73]  
 because [11] 5/4 7/15 7/18 7/20 10/15  
 11/25 15/24 16/24 19/5 20/13 24/18  
 been [23] 3/21 3/25 5/17 5/24 7/16  
 8/11 9/7 9/18 9/21 9/23 9/23 9/25  
 10/10 10/23 11/25 15/14 15/24 16/24  
 19/3 21/9 23/17 24/4 25/12  
 before [8] 1/9 5/9 5/25 7/8 7/25 12/4  
 18/13 18/22  
 behalf [1] 2/24  
 behind [1] 3/12  
 being [8] 4/21 8/10 11/14 15/9 19/12  
 21/2 21/25 27/2  
 believe [8] 11/17 17/9 17/23 18/1 23/10  
 23/24 24/1 24/3  
 believed [1] 22/20  
 believes [2] 14/15 14/23  
 beneficiary [1] 23/21  
 besides [1] 20/5  
 best [3] 4/14 20/17 28/6  
 between [5] 9/21 13/11 13/15 14/3  
 14/13  
 big [2] 17/10 17/12  
 board [1] 21/15  
 bond [3] 4/8 19/17 19/17  
 both [1] 19/16  
 bound [1] 14/15  
 branch [3] 8/4 9/1 15/20  
 brief [3] 14/9 23/12 24/13  
 briefed [1] 26/12  
 briefing [19] 13/3 15/9 15/12 15/13  
 20/18 21/6 22/25 23/14 24/7 24/8  
 24/19 25/4 25/12 25/14 26/14 26/16  
 26/18 26/18 27/4  
 briefings [1] 15/4  
 BROAD [1] 1/19  
 but [26] 6/14 8/3 8/10 8/15 9/25 10/8  
 10/16 11/1 13/9 15/17 16/2 16/16  
 16/21 17/9 17/12 18/2 18/9 19/10  
 20/25 22/19 23/12 23/15 24/5 24/9  
 26/6 26/8

**C**

call [1] 20/4  
 can [12] 5/9 5/25 7/1 9/2 9/5 11/10  
 11/24 12/24 13/2 21/5 23/14 26/14  
 can't [6] 4/3 12/7 14/19 14/23 19/4  
 20/15  
 cannot [6] 6/21 7/14 14/17 15/2 23/11  
 24/10  
 careful [1] 17/9  
 carved [2] 16/6 16/8  
 case [4] 5/21 10/22 13/21 26/11  
 cases [1] 24/3  
 CCR [1] 1/24

C	D	E
<p>CDL [1] 1/4            certainly [8] 12/21 12/23 13/2 18/9 20/2            20/20 20/22 23/14            certainty [1] 4/4            CERTIFICATE [1] 28/1            certify [1] 28/5            challenge [3] 5/15 6/18 11/4            challenging [2] 7/19 13/7            chance [1] 20/19            change [1] 19/24            channels [2] 17/25 20/13            charge [2] 4/8 23/22            charges [1] 23/23            circumstance [1] 11/1            circumstances [2] 4/19 26/4            citizen [1] 16/13            citizens [3] 21/8 21/18 24/2            claim [5] 4/12 13/23 16/17 16/18 23/24            claims [7] 7/12 7/19 11/24 16/12 19/2            21/25 23/15            clarify [3] 3/13 10/3 25/10            CLAY [1] 1/9            clear [6] 8/2 19/18 19/20 21/23 25/20            25/22            clearly [2] 13/25 19/21            client [8] 10/7 13/4 14/9 19/3 19/22            20/24 21/20 26/6            client's [1] 19/18            colorable [1] 16/18            colorably [1] 16/13            COLUMBUS [3] 1/2 1/6 1/15            comes [2] 6/6 8/13            comforted [1] 25/6            commit [1] 14/7            committed [1] 10/18            complete [1] 25/15            completed [5] 15/9 22/25 25/12 26/14            27/4            comply [1] 7/11            conceded [1] 6/4            concern [1] 26/11            concerning [1] 23/16            concerns [1] 16/21            confer [2] 26/5 26/9            conference [2] 28/7 28/10            conferring [1] 10/7            confinement [1] 13/7            conformance [1] 28/9            Congress [1] 16/8            consent [1] 21/20            considerable [1] 19/23            constitutes [2] 8/5 12/9            consultation [1] 13/3            contend [2] 17/1 17/4            contends [2] 17/2 17/22            contention [1] 11/12            contest [15] 3/4 3/10 4/20 8/6 9/12 12/3            12/8 12/15 12/16 14/21 15/22 18/5            18/13 18/20 22/20            contested [1] 8/9            contesting [1] 6/11            continue [1] 18/20            corpus [2] 12/24 25/19            correct [13] 3/15 3/23 3/24 5/12 10/14            11/16 11/17 14/6 14/12 21/10 24/1            24/25 28/6            correctly [1] 14/25            could [13] 7/17 7/17 10/6 11/15 15/12            16/14 19/24 20/2 22/25 24/15 24/16</p>	<p>24/24 25/6            couldn't [1] 13/20            counsel [4] 20/4 23/6 23/25 24/1            country [5] 5/8 12/4 18/2 18/3 21/24            court [47]            Court's [8] 5/14 6/2 6/17 12/22 14/24            16/20 16/20 20/23            covers [1] 14/12            craft [1] 22/24            criteria [1] 19/21            current [6] 14/12 14/14 21/9 21/12            21/14 23/16            currently [8] 4/6 10/16 11/4 15/24 20/9            21/13 23/22 23/25            Customs [1] 9/17            CV [1] 1/4            CVR [1] 1/24</p> <hr/> <p>D</p> <p>DANIE [1] 1/19            Daniel [1] 2/13            Dated [1] 28/12            dates [1] 26/19            day [2] 8/17 28/12            days [3] 24/21 24/22 24/25            De [2] 17/3 17/13            decide [5] 14/5 20/19 20/21 20/23 27/3            decides [2] 4/17 5/21            decision [10] 5/12 5/14 6/2 6/3 8/23            9/21 10/13 12/15 12/22 14/21            declaration [2] 19/18 21/22            declarations [1] 24/8            DEFENDANT [1] 1/18            DEFENDANTS [5] 1/6 2/21 2/25 24/13            25/7            deny [1] 13/19            Department [1] 17/14            deport [2] 4/17 18/8            deportation [7] 4/19 5/23 18/18 20/9            20/13 21/18 21/21            deportees [1] 18/2            departing [1] 5/23            deprive [2] 6/10 8/6            described [2] 7/10 11/21            designate [7] 8/15 8/15 8/16 9/13 9/15            10/6 19/25            designated [33]            designation [33]            designee [2] 5/15 13/6            despite [1] 22/8            detained [2] 4/11 16/2            detention [3] 10/18 11/4 16/4            determination [7] 3/8 6/23 8/21 9/25            10/19 18/4 18/15            determine [2] 8/5 10/18            determined [1] 9/11            determines [1] 13/15            DGALINDO [1] 1/20            dictate [1] 10/18            did [2] 19/9 22/13            didn't [1] 12/23            difference [1] 9/21            different [2] 10/22 21/16            difficulties [1] 20/6            directly [2] 23/6 24/5            discretion [2] 10/19 17/11            discretionary [2] 10/19 16/5            discuss [2] 23/14 24/6            discussing [1] 6/6            district [12] 1/1 1/1 1/10 1/15 2/23 6/10</p>	<p>13/6 15/8 20/11 25/4 28/4 28/5            DIVISION [2] 1/2 1/15            do [16] 2/6 2/9 2/16 3/12 3/15 15/10            15/11 17/11 18/9 21/17 23/1 24/18            24/20 25/2 26/16 28/5            does [14] 6/1 6/3 6/25 8/3 9/20 12/3            12/11 12/18 13/19 15/6 15/11 17/3            17/11 18/17            doesn't [1] 13/22            don't [4] 5/22 11/3 12/17 18/3            done [3] 15/12 22/9 25/14            down [2] 6/6 14/11            DRAMMEH [4] 1/24 1/25 28/3 28/17            drop [1] 19/24            due [6] 7/11 8/5 8/9 13/19 14/24 26/19            during [4] 5/3 15/13 24/19 25/4</p> <hr/> <p>E</p> <p>earlier [1] 19/15            effectively [2] 7/17 16/7            either [3] 6/7 11/18 12/7            EI [5] 8/19 8/22 18/13 21/3 22/10            elements [1] 23/2            else [3] 20/14 25/23 26/21            elsewhere [1] 21/2            EMAIL [2] 1/16 1/20            EMERGENCY [1] 1/9            end [2] 9/3 27/6            Enemies [1] 4/1            enemy [19] 3/5 3/21 4/21 5/7 5/25 6/11            9/8 9/10 9/22 10/1 10/12 11/14 14/21            17/17 18/11 18/21 18/22 19/4 22/21            enforcement [2] 5/16 9/18            enjoining [1] 21/5            enter [1] 11/15            entirely [1] 11/23            entitled [5] 5/10 12/14 12/22 18/7 28/8            entry [1] 23/24            ET [1] 1/6            evaluate [1] 20/19            evaluated [5] 3/25 5/5 9/18 10/4 17/7            even [2] 11/8 11/10            ever [2] 18/21 19/6            everybody [1] 2/7            everyone [1] 2/3            exactly [3] 2/19 22/8 22/11            example [3] 5/21 6/7 8/16            executive [3] 8/4 9/1 15/20            expedited [2] 17/18 17/24            extent [1] 25/8            extreme [1] 8/16</p> <hr/> <p>F</p> <p>facility [2] 6/8 20/3            fact [3] 12/2 16/19 20/6            far [6] 5/16 6/20 10/5 16/22 18/5 19/22            federal [3] 8/22 28/3 28/18            few [1] 24/4            file [12] 5/1 6/17 6/25 7/7 8/14 8/18            12/18 12/24 13/6 13/16 14/4 14/14            filed [8] 5/4 6/23 7/2 7/3 8/19 13/8            21/23 22/16            files [1] 13/12            filing [1] 24/21            final [1] 22/13            find [1] 17/12            finding [2] 21/3 25/17            finds [2] 7/22 25/15            first [6] 2/5 2/11 15/24 16/19 19/14            20/20</p>

F	G	H
<p>FL [1] 1/19 focus [2] 19/10 26/5 foregoing [1] 28/5 foreign [1] 17/14 format [1] 28/8 formulate [1] 18/19 forth [1] 7/12 freely [1] 11/2 freeze [1] 20/21 Friday [1] 20/2 front [1] 9/3 full [2] 17/11 25/8 further [4] 24/1 25/9 25/21 26/23 future [6] 4/4 4/13 6/20 10/6 10/22 22/21</p>	<p>having [3] 8/8 10/2 15/7 he [77] he's [10] 3/8 7/8 7/20 8/21 9/9 9/23 12/16 12/22 17/3 23/21 hear [3] 2/11 18/6 19/9 heard [5] 7/8 18/24 19/22 25/8 25/9 hearing [6] 1/9 2/15 4/9 5/10 19/17 19/18 hearings [1] 4/9 here [5] 8/1 17/21 18/6 21/2 24/9 here's [1] 12/17 hereby [1] 28/5 hesitancy [1] 19/23 hesitant [2] 10/7 14/7 him [39] himself [1] 21/3 his [26] 3/9 4/18 4/20 5/1 5/11 6/11 6/11 7/7 11/4 11/4 11/14 13/12 13/15 14/3 14/14 15/12 16/4 17/15 18/5 18/15 18/18 18/20 22/19 23/23 25/16 25/19 Homeland [1] 19/12 Honor [47] Honor's [2] 23/7 23/19 HONORABLE [1] 1/9 hopping [1] 22/7 hours [4] 12/17 13/21 14/6 14/21 how [11] 2/16 5/16 12/11 12/15 12/18 14/2 18/3 18/4 18/19 24/17 24/19 However [1] 7/13 hypothetical [3] 10/8 10/21 16/9 hypothetically [2] 10/6 10/21</p>	<p>irreparable [2] 11/10 16/23 is [163] issuance [1] 4/25 issue [2] 8/4 26/12 issues [2] 2/15 23/1 it [50] it's [6] 2/17 8/2 10/20 16/25 22/6 22/10 its [4] 7/20 10/19 11/20 19/24 itself [1] 11/20</p>
<p><b>G</b> G-A-L-I-N-D-O [1] 2/17 GALINDO [8] 1/19 2/14 2/18 19/2 21/7 24/24 25/23 26/21 GAMD.USCOURTS.GOV [1] 1/25 gang [7] 17/3 17/13 17/14 17/16 17/22 18/5 19/14 general [1] 23/13 generally [1] 26/7 GEORGIA [6] 1/1 1/6 1/15 2/24 25/4 28/5 get [5] 10/13 12/24 15/17 15/17 20/4 gets [1] 18/4 getting [1] 20/6 give [5] 4/20 13/22 14/17 15/2 18/23 given [8] 4/5 5/17 8/1 12/7 14/1 15/3 23/8 26/4 giving [1] 8/16 go [3] 13/13 14/8 17/19 going [16] 2/6 2/10 2/20 3/7 3/8 7/24 9/1 9/13 9/15 14/2 14/5 18/8 18/23 24/18 25/2 25/3 gone [2] 12/18 20/2 good [3] 2/3 15/11 27/4 got [9] 8/14 8/17 12/17 14/3 14/6 15/21 17/21 18/6 18/10 GOVERNMENT [37] Government's [9] 3/5 3/6 4/10 4/20 6/5 7/5 7/9 20/25 22/22 grant [2] 11/13 22/23 GRANTHAM [13] 1/14 2/22 3/6 3/23 5/20 8/2 9/15 15/17 17/8 22/15 25/20 26/3 26/25 grounds [1] 26/8 guess [3] 18/19 22/17 25/6 Gunn [1] 2/6</p>	<p><b>I</b> I'm [9] 3/12 5/19 6/9 6/13 8/16 17/5 17/6 24/18 25/17 I-213 [2] 19/10 19/15 ICE [2] 10/4 11/5 ICE's [1] 10/17 idea [1] 9/14 if [44] immediately [1] 22/7 immense [1] 20/6 immigration [15] 4/7 4/12 9/17 9/17 10/17 17/20 19/17 20/10 20/24 21/1 22/5 22/6 22/13 23/20 23/25 imminent [2] 15/15 16/18 impacts [1] 5/16 implement [2] 6/1 8/24 imprisoned [1] 18/2 in [75] INA [1] 16/3 include [1] 4/25 includes [1] 16/4 indecipherable [1] 21/25 indeed [1] 7/14 indication [1] 11/24 individual [2] 10/23 10/25 individuals [1] 24/3 information [3] 14/9 14/17 15/3 injunction [2] 3/18 25/7 injured [1] 13/21 injury [4] 11/9 13/21 16/18 16/23 intend [1] 12/23 intends [2] 10/1 17/23 interaction [1] 15/25 interfere [2] 18/18 20/12 into [1] 10/21 invading [1] 16/7 Investigation [1] 19/12</p>	<p><b>J</b> JOAN [4] 1/24 1/25 28/3 28/17 judge [4] 1/10 2/3 2/9 19/17 judicial [15] 6/3 8/7 8/10 8/12 8/21 10/13 10/20 12/23 13/13 13/14 15/21 16/6 16/6 16/8 28/9 jurisdiction [3] 6/10 6/18 8/23 just [12] 2/10 2/11 3/15 8/16 10/3 12/14 12/23 17/9 18/8 20/20 22/16 26/19</p> <p><b>K</b> kind [6] 3/18 4/4 4/14 6/1 15/25 23/10 know [1] 2/14 knowledge [3] 10/9 15/15 28/6 known [2] 19/12 22/10 knows [1] 9/13</p> <p><b>L</b> lacks [2] 7/19 18/3 LAND [2] 1/9 2/3 large [1] 11/19 last [2] 2/16 24/4 later [1] 19/13 laws [2] 21/1 22/5 lawyer [1] 17/9 learned [1] 19/19 least [1] 16/14 length [1] 13/15 let [8] 2/11 2/14 3/14 14/11 15/6 21/7 21/16 24/5 light [1] 6/2 like [6] 7/17 11/1 23/4 23/5 23/13 26/8 likelihood [4] 17/23 22/18 24/11 25/18 likely [3] 4/2 7/23 24/18 limitation [1] 13/19 limitations [1] 13/20 limited [3] 15/8 21/5 25/16 line [1] 2/4 list [3] 2/6 2/7 2/10 litigating [1] 23/24 litigation [1] 21/14 located [1] 6/16 location [3] 5/24 10/18 16/3 look [1] 7/17</p>
<p><b>H</b> habeas [13] 5/1 5/14 6/11 6/17 6/23 7/7 8/15 8/18 12/24 13/6 13/12 22/19 25/19 HAC [1] 1/21 had [7] 8/20 9/11 10/12 22/12 22/15 25/7 25/12 happening [1] 12/19 happens [1] 20/1 happy [7] 3/12 13/17 14/8 14/9 23/12 24/6 26/13 hard [1] 17/9 harm [2] 10/14 21/1 has [66] hat [1] 19/24 have [35]</p>	<p><b>M</b> made [7] 3/8 6/23 9/21 9/25 18/21 19/8 21/23 maintain [1] 24/19 maintaining [2] 9/9 15/7 maintains [2] 17/2 22/25 make [7] 2/5 3/14 9/3 9/5 13/23 18/4 18/14 makes [2] 4/17 19/18 manner [3] 15/20 17/18 17/25 many [1] 22/11 matter [5] 15/12 15/19 19/3 26/1 28/8 may [12] 1/5 2/1 5/15 8/9 8/9 10/22 13/6 14/20 18/9 20/13 24/22 28/12 maybe [2] 9/13 17/1</p>	<p><b>M</b> made [7] 3/8 6/23 9/21 9/25 18/21 19/8 21/23 maintain [1] 24/19 maintaining [2] 9/9 15/7 maintains [2] 17/2 22/25 make [7] 2/5 3/14 9/3 9/5 13/23 18/4 18/14 makes [2] 4/17 19/18 manner [3] 15/20 17/18 17/25 many [1] 22/11 matter [5] 15/12 15/19 19/3 26/1 28/8 may [12] 1/5 2/1 5/15 8/9 8/9 10/22 13/6 14/20 18/9 20/13 24/22 28/12 maybe [2] 9/13 17/1</p>

<p><b>M</b></p> <p>me [15] 2/11 2/14 2/15 3/14 8/2 8/23 13/12 13/25 14/11 15/6 15/18 21/7 21/16 24/5 24/17</p> <p>mean [4] 9/20 9/23 18/6 25/10</p> <p>meaningful [19] 3/4 6/3 8/1 8/20 8/25 10/12 12/10 12/15 12/22 12/25 13/14 13/22 13/24 14/1 15/21 18/4 18/12 18/16 18/23</p> <p>meaningfully [1] 7/8</p> <p>means [1] 14/2</p> <p>mechanism [2] 5/5 5/14</p> <p>member [3] 17/3 17/3 17/22</p> <p>members [2] 17/12 17/16</p> <p>membership [1] 19/9</p> <p>men [2] 22/9 22/12</p> <p>mentioned [3] 13/5 20/1 20/17</p> <p>merits [1] 24/7</p> <p>met [1] 23/3</p> <p>middle [7] 1/1 1/14 2/23 6/10 20/9 25/4 28/4</p> <p>midnight [2] 8/17 20/2</p> <p>might [1] 23/10</p> <p>mind [1] 19/24</p> <p>minimum [1] 12/9</p> <p>moment [2] 16/2 19/19</p> <p>months [1] 24/4</p> <p>mooted [2] 15/12 15/19</p> <p>more [1] 17/24</p> <p>morning [1] 2/3</p> <p>motion [9] 3/2 25/5 25/13 26/1 26/2 26/7 26/15 26/17 26/18</p> <p>Mr [3] 9/15 17/8 21/7</p> <p>Mr. [14] 2/6 3/6 3/23 5/20 8/2 15/17 19/2 22/15 24/24 25/20 25/23 26/3 26/21 26/25</p> <p>Mr. Galindo [4] 19/2 24/24 25/23 26/21</p> <p>Mr. Grantham [9] 3/6 3/23 5/20 8/2 15/17 22/15 25/20 26/3 26/25</p> <p>Mr. Gunn [1] 2/6</p> <p>much [3] 14/3 24/17 24/20</p> <p>my [21] 3/17 4/4 5/2 7/2 9/16 10/3 10/7 10/8 13/3 13/7 13/10 14/9 14/18 15/1 15/15 16/25 21/11 21/19 26/5 26/6 28/6</p>	<p>now [9] 6/20 8/14 9/13 16/19 16/21 18/17 19/3 21/17 25/6</p> <p>NY [1] 1/19</p> <p><b>O</b></p> <p>object [2] 15/7 15/10</p> <p>objection [1] 26/2</p> <p>obtain [2] 12/11 19/4</p> <p>obviously [2] 5/11 20/6</p> <p>occur [3] 4/23 11/8 16/2</p> <p>occurred [1] 16/9</p> <p>occurring [1] 20/18</p> <p>occurs [1] 6/19</p> <p>off [1] 8/19</p> <p>offer [1] 23/10</p> <p>Office [1] 2/23</p> <p>OFFICIAL [3] 28/1 28/3 28/18</p> <p>okay [10] 8/14 9/9 10/10 12/13 12/17 12/24 13/20 14/19 21/20 27/2</p> <p>on [38]</p> <p>once [5] 7/2 7/3 8/21 11/16 13/8</p> <p>one [4] 6/7 6/23 9/24 20/4</p> <p>ongoing [3] 22/6 22/8 22/13</p> <p>only [2] 9/4 11/15</p> <p>operated [1] 21/1</p> <p>operating [1] 10/21</p> <p>operation [1] 23/17</p> <p>opinion [1] 7/18</p> <p>opportunity [26] 3/4 3/9 4/20 5/1 6/17 8/1 8/20 9/12 10/13 12/3 12/8 13/14 13/22 13/24 14/1 15/4 15/21 18/5 18/12 18/15 18/20 18/24 22/16 25/7 25/8 25/13</p> <p>oppose [5] 3/7 3/12 3/15 3/18 26/7</p> <p>or [24] 3/18 4/17 6/8 7/11 7/20 8/8 8/9 9/1 10/18 10/24 11/4 11/10 11/21 11/21 12/8 13/13 14/24 16/14 17/2 17/23 21/18 24/5 24/8 24/13</p> <p>order [20] 3/3 3/7 6/17 7/7 9/7 12/6 12/8 16/17 16/17 18/19 22/23 23/3 25/3 25/6 25/9 25/11 25/14 25/19 25/21 25/25</p> <p>ordered [2] 10/11 20/11</p> <p>orders [1] 22/13</p> <p>organization [1] 17/15</p> <p>other [8] 4/9 4/16 4/18 8/13 9/22 11/9 11/19 21/6</p> <p>otherwise [2] 7/12 14/22</p> <p>our [14] 3/11 3/17 11/18 16/21 19/18 19/22 20/24 22/5 23/9 23/13 23/20 23/21 24/6 26/5</p> <p>out [2] 16/6 16/8</p> <p>outside [2] 6/22 21/1</p> <p>over [1] 6/11</p>	<p>15/8 25/16</p> <p>person [1] 13/22</p> <p>personal [1] 13/21</p> <p>personally [1] 20/16</p> <p>petition [26] 3/1 4/23 5/2 5/4 6/11 6/18 6/23 6/25 7/2 7/3 7/7 7/10 8/15 8/18 11/2 12/18 12/24 13/6 13/12 13/16 14/14 16/25 22/19 23/15 24/9 25/19</p> <p>petitioner [32]</p> <p>Petitioner's [3] 23/6 23/19 24/1</p> <p>place [11] 4/24 8/24 10/24 10/24 12/6 12/8 13/23 14/12 14/14 15/2 20/21</p> <p>PLAINTIFF [2] 1/4 7/6</p> <p>plan [1] 4/20</p> <p>Please [1] 2/14</p> <p>point [16] 4/15 5/2 6/4 6/12 6/19 7/15 11/23 11/25 13/19 16/7 16/10 16/11 16/11 16/16 23/13 25/24</p> <p>points [1] 15/24</p> <p>policy [5] 14/6 14/12 14/14 14/17 17/10</p> <p>position [21] 3/11 3/17 4/4 4/10 6/5 6/14 7/5 7/9 7/13 9/14 11/18 16/21 17/16 20/25 22/22 23/1 23/7 23/9 23/13 24/6 26/6</p> <p>possibility [1] 11/14</p> <p>possible [1] 4/13</p> <p>posture [1] 22/11</p> <p>potential [11] 3/5 4/13 11/6 15/19 15/25 16/2 16/9 16/12 16/15 20/12 23/16</p> <p>power [1] 20/20</p> <p>practical [1] 20/3</p> <p>precisely [1] 22/7</p> <p>preface [1] 23/4</p> <p>preliminary [1] 25/6</p> <p>present [5] 3/22 7/23 16/17 22/17 25/5</p> <p>presented [1] 24/9</p> <p>presents [1] 16/18</p> <p>preserve [1] 20/23</p> <p>president [2] 17/11 17/15</p> <p>prevail [2] 22/19 25/18</p> <p>prevent [2] 3/7 25/16</p> <p>prevents [1] 15/20</p> <p>prison [4] 18/13 21/4 22/10 22/12</p> <p>PRO [1] 1/21</p> <p>probably [2] 9/12 25/10</p> <p>problem [3] 8/1 8/3 15/18</p> <p>procedures [5] 4/24 7/17 7/20 13/4 14/8</p> <p>proceed [6] 10/1 26/7 26/11 26/14 26/15 26/17</p> <p>proceeding [1] 13/2</p> <p>proceedings [10] 2/2 4/6 4/10 10/16 11/4 20/9 22/6 22/8 22/13 23/22</p> <p>process [21] 5/23 7/6 7/10 7/11 8/5 8/10 8/11 10/2 12/9 12/9 13/20 14/4 14/24 15/2 15/13 17/19 18/11 18/18 18/25 20/12 20/14</p> <p>processed [4] 3/25 9/19 9/21 9/23</p> <p>processing [1] 18/11</p> <p>proclamation [3] 3/22 17/16 19/20</p> <p>prohibit [1] 3/18</p> <p>promptly [1] 27/3</p> <p>promulgation [1] 11/20</p> <p>properly [1] 25/14</p> <p>protect [1] 12/18</p> <p>protected [4] 10/20 16/5 21/2 21/8</p> <p>protection [1] 8/24</p> <p>protections [1] 22/5</p> <p>protective [2] 21/13 21/15</p> <p>provide [2] 3/12 16/13</p>
<p><b>N</b></p> <p>nail [1] 14/11</p> <p>name [1] 2/16</p> <p>Nationality [3] 4/7 4/12 10/17</p> <p>Naturalization [1] 20/10</p> <p>necessarily [3] 8/3 14/15 18/18</p> <p>necessary [1] 12/10</p> <p>need [3] 2/10 7/13 24/17</p> <p>needs [3] 7/25 8/24 10/24</p> <p>NEW [1] 1/19</p> <p>next [1] 20/17</p> <p>no [24] 7/18 8/22 9/7 9/14 10/14 10/15 11/1 11/9 11/13 11/23 12/6 12/8 13/10 14/12 14/14 15/15 15/15 16/22 20/4 21/22 23/7 24/10 26/13 27/1</p> <p>non [2] 16/13 24/2</p> <p>non-citizen [1] 16/13</p> <p>non-citizens [1] 24/2</p> <p>normal [3] 18/2 18/18 20/13</p> <p>not [80]</p> <p>noted [1] 19/11</p> <p>nothing [2] 12/13 26/23</p> <p>notice [4] 4/25 12/17 14/4 27/3</p> <p>NOTICED [1] 1/21</p>	<p><b>P</b></p> <p>page [1] 28/8</p> <p>parallel [1] 18/10</p> <p>part [1] 20/14</p> <p>participating [1] 2/7</p> <p>particular [6] 3/20 8/17 18/1 26/6 26/8 26/10</p> <p>particulars [1] 15/3</p> <p>parties [1] 2/8</p> <p>pause [1] 21/14</p> <p>pendency [2] 5/4 25/4</p> <p>pending [1] 24/3</p> <p>people [1] 13/25</p> <p>perhaps [2] 14/9 22/15</p> <p>period [7] 7/1 8/9 13/11 13/12 14/13</p>	

P	Q	R
<p>provided [2] 3/4 28/7  provision [1] 4/7  provisions [1] 4/11  pseudonym [7] 26/1 26/2 26/8 26/12 26/14 26/15 26/17  purpose [1] 24/10  purposes [1] 21/18  pursuant [2] 6/16 13/9  pursue [1] 13/22  pursuing [2] 21/23 22/12  push [2] 17/10 17/12</p>	<p>restraining [5] 9/7 22/23 23/3 25/5 25/13  restrict [1] 20/15  review [22] 6/3 8/7 8/9 8/10 8/12 8/21 8/23 8/25 9/2 9/6 10/13 10/20 12/10 12/15 12/23 13/13 13/14 15/21 16/6 16/6 16/8 22/16  reviewed [3] 12/25 13/24 18/15  revocation [1] 21/14  right [19] 2/18 3/1 6/3 6/20 8/14 8/25 9/13 12/25 13/16 14/3 16/21 17/24 18/1 18/9 18/17 20/12 22/4 22/20 26/10  rights [1] 8/5  ripe [1] 16/18  ROGER [2] 1/14 2/22  ROGER.GRANTHAM [1] 1/16  round [1] 17/13  rule [1] 25/13  rushing [1] 24/18</p>	<p>somebody [1] 13/19  something [1] 20/7  somewhere [1] 20/14  speaking [4] 2/6 2/11 2/20 2/24  specific [3] 13/1 13/4 14/17  specifically [6] 6/13 10/8 16/5 19/11 21/25 23/9  speculate [1] 10/7  speculative [5] 4/14 11/7 11/23 19/5 19/22  speed [1] 5/21  spell [1] 2/16  ST [1] 1/19  staid [1] 9/5  standard [7] 4/7 4/11 5/22 7/12 17/19 23/11 23/18  standards [1] 11/20  standing [5] 7/18 7/19 11/24 16/13 16/16  standpoint [1] 17/11  stands [1] 19/3  state [5] 4/4 6/13 11/3 17/14 23/8  stated [1] 13/5  states [12] 1/1 1/10 1/14 4/24 5/14 6/7 6/22 17/18 18/7 22/3 28/4 28/10  status [12] 6/11 9/9 14/22 15/7 18/21 18/23 21/9 21/13 21/15 22/25 23/20 24/19  statute [6] 3/22 9/24 12/13 13/19 13/20 17/20  stay [1] 11/11  step [3] 20/18 20/20 21/5  Stewart [2] 20/24 22/6  still [1] 21/8  stipulate [3] 9/2 14/2 18/24  stipulated [1] 18/22  subject [7] 7/15 7/20 8/11 11/3 17/17 19/20 21/8  subjection [1] 21/13  submit [6] 13/17 14/10 15/4 15/4 24/13 24/15  submitted [1] 19/15  substantial [6] 11/10 16/22 19/21 22/18 24/11 25/18  substantially [2] 7/23 19/1  success [1] 24/11  such [3] 8/6 16/6 27/3  Sunday [1] 20/3  Supreme [13] 5/11 5/14 6/2 6/17 8/7 8/14 8/25 12/10 12/21 13/5 13/25 14/24 18/12  sure [4] 2/5 3/14 13/23 18/14</p>
Q	S	T
<p>qualifies [1] 9/25  qualify [2] 9/22 17/17  question [10] 6/24 7/1 7/14 7/14 13/10 18/19 21/17 23/7 23/12 24/5  questions [5] 11/23 21/6 23/19 24/8 24/9  quick [1] 21/3  quo [4] 9/9 15/7 22/25 24/19  quoted [1] 19/15</p>	<p>said [7] 3/15 8/7 8/25 12/10 13/25 18/12 26/8  Salvador [5] 8/19 8/22 18/13 21/3 22/10  same [2] 26/17 26/19  satisfied [1] 22/17  satisfy [4] 8/9 14/24 23/11 23/18  say [8] 4/5 9/9 12/23 13/4 13/20 14/19 14/20 14/23  saying [1] 17/10  says [11] 5/12 8/13 8/14 12/7 12/8 12/13 12/14 12/16 12/22 19/11 19/13  scenario [1] 10/8  schedule [7] 23/14 24/7 24/19 25/5 26/16 26/18 27/4  scheduled [1] 20/5  second [1] 16/11  Security [1] 19/12  see [2] 8/3 18/3  seeking [2] 3/3 22/5  seeks [2] 5/7 22/2  seemed [1] 13/18  seems [3] 8/23 13/24 15/18  send [2] 18/1 20/14  sent [2] 18/13 22/12  separately [1] 19/13  set [2] 5/25 7/12  seven [1] 24/25  several [1] 4/9  shall [1] 25/20  ship [1] 8/19  short [2] 4/5 27/3  should [2] 5/4 8/4  show [3] 11/11 11/24 24/11  sice [1] 22/16  simplify [1] 18/25  simply [3] 9/8 15/19 16/12  since [2] 24/9 25/7  situation [1] 16/9  six [1] 13/21  slightly [1] 21/16  so [22] 4/10 5/6 7/24 7/24 8/23 9/11 10/2 10/10 10/10 10/11 10/20 11/12 11/16 13/23 17/21 19/6 19/20 19/21 19/25 21/1 22/2 24/19  solely [3] 5/22 6/14 8/5  some [9] 6/19 8/24 9/3 14/5 17/9 18/14 23/5 23/10 25/8</p>	<p>take [1] 21/4  taking [1] 17/16  talking [1] 6/9  targeted [1] 19/11  TdA [3] 19/9 19/13 19/14  telephone [1] 28/7  tell [2] 8/17 24/17  temporary [8] 9/7 21/8 21/12 21/15 22/23 23/3 25/5 25/13  terms [1] 19/24  terrorist [1] 17/15  than [2] 14/4 17/25  Thank [3] 2/13 26/24 27/2  that [232]  that's [14] 2/7 3/15 3/24 5/11 5/19 5/19 9/24 10/22 11/17 18/10 21/2 21/9 22/4</p>
R		
<p>raised [2] 23/6 23/15  read [1] 3/1  reality [1] 20/4  reasonable [1] 24/12  reasoning [1] 3/12  reasons [1] 11/6  receive [1] 21/6  recent [2] 6/2 19/17  recognize [1] 16/20  record [3] 7/23 22/18 27/6  recording [1] 28/7  regard [3] 11/15 14/2 23/1  regarding [1] 4/12  regulations [1] 28/9  reiterate [1] 4/23  release [1] 4/15  relied [1] 19/16  relief [5] 11/13 11/15 12/11 16/23 19/4  rely [1] 5/22  remain [1] 22/2  remedy [4] 9/4 10/24 11/11 22/24  removability [2] 4/8 23/22  removal [12] 4/6 4/21 5/11 10/16 11/4 15/13 15/16 15/22 17/18 22/14 23/22 24/2  remove [4] 17/23 17/24 18/22 21/12  removed [12] 5/3 5/8 7/2 7/3 7/8 12/4 12/7 13/9 14/22 21/9 21/25 24/4  removing [3] 15/20 17/25 22/7  repeat [1] 6/15  repeated [1] 19/9  report [2] 19/10 19/10  REPORTER [3] 28/1 28/3 28/18  require [1] 16/23  required [4] 7/1 8/8 9/24 17/19  requirement [2] 14/13 16/16  requirements [2] 7/11 14/24  resolution [1] 7/4  respect [1] 25/25  respond [3] 15/23 23/5 24/24  Respondent [1] 2/24  Respondent's [2] 6/13 7/13  Respondents [1] 24/13  response [4] 3/6 19/7 20/8 24/13  rest [1] 27/4</p>		

T  
 that's... [1] 25/22  
 their [4] 7/12 13/23 20/12 21/18  
 them [5] 2/12 16/17 17/13 19/9 26/9  
 then [20] 3/9 5/1 5/9 7/1 7/5 7/25 7/25  
 8/6 8/18 9/4 11/5 12/3 14/4 15/11  
 16/13 18/3 18/14 18/25 19/13 21/3  
 there [23] 4/24 5/6 8/24 10/13 11/1  
 11/12 13/12 14/5 14/12 14/18 15/2  
 15/15 15/18 16/14 16/22 17/10 19/21  
 20/22 24/10 25/17 25/23 26/1 26/10  
 there's [12] 7/4 7/18 9/7 9/23 11/9  
 11/23 12/6 12/13 14/14 17/12 20/6  
 22/18  
 thereafter [1] 5/2  
 therefore [1] 17/17  
 therefore [3] 7/16 7/24 19/4  
 these [3] 13/25 21/6 23/1  
 they [22] 2/12 5/21 5/22 5/23 5/23 9/13  
 9/15 11/3 11/3 12/23 16/19 17/1 17/17  
 17/24 18/1 18/1 19/9 20/5 20/13 22/12  
 26/7 26/7  
 they've [1] 14/3  
 thing [2] 4/16 9/24  
 think [9] 6/6 8/1 9/12 18/14 20/1 20/17  
 21/4 23/12 24/16  
 this [62]  
 those [6] 4/9 7/16 7/19 11/22 11/24  
 13/4  
 though [1] 9/2  
 threat [3] 11/10 16/22 19/22  
 through [5] 13/3 17/19 17/25 20/13  
 24/7  
 Thursday [1] 2/1  
 thwart [1] 12/21  
 ties [1] 19/14  
 time [32]  
 timely [1] 21/23  
 timing [1] 23/8  
 Title [2] 10/20 16/3  
 today [3] 14/19 14/23 25/17  
 torture [1] 22/10  
 totally [1] 11/6  
 TPS [1] 23/21  
 track [2] 18/10 22/7  
 traditional [1] 17/25  
 transcript [3] 1/9 28/6 28/8  
 transfer [23] 3/7 3/12 3/15 3/19 4/17  
 5/9 5/17 5/24 5/24 6/1 6/6 6/9 6/14  
 6/22 9/5 11/5 11/11 16/1 16/4 16/21  
 21/2 21/5 25/16  
 transferred [11] 3/3 7/25 8/22 9/10  
 10/11 15/8 20/11 25/3 25/9 25/11  
 25/20  
 transferring [1] 8/11  
 Tren [2] 17/3 17/12  
 TRO [13] 1/9 3/18 16/22 16/23 23/10  
 23/11 23/16 23/18 24/10 24/14 26/5  
 26/18 26/19  
 true [1] 28/6  
 TRUMP [1] 1/6  
 truncated [1] 8/8  
 turnaround [2] 4/5 15/3  
 turned [1] 20/7  
 two [3] 12/17 14/21 15/23  
 type [1] 12/11

U  
 U.S [1] 2/23  
 uncertainty [1] 19/23

unchallenged [1] 11/3  
 under [30]  
 undergone [2] 4/8 4/9  
 underlying [1] 25/19  
 understand [12] 3/2 3/14 3/20 13/10  
 14/5 16/19 17/8 17/13 20/5 20/25  
 21/17 22/11  
 understanding [14] 5/3 7/2 9/16 10/4  
 13/8 14/18 14/25 15/1 16/25 21/11  
 21/19 23/20 23/21 26/6  
 understands [1] 8/2  
 undertaken [1] 23/17  
 UNITED [10] 1/1 1/10 1/14 6/7 6/22  
 17/18 18/7 22/2 28/4 28/10  
 unlawful [1] 23/23  
 unrelated [2] 11/6 23/23  
 until [16] 3/8 6/22 7/3 8/18 9/5 9/10  
 10/12 12/2 12/7 12/12 22/25 25/9  
 25/11 25/20 26/12 26/14  
 up [2] 5/22 17/13  
 upon [9] 4/18 4/18 4/21 5/8 10/11  
 11/13 16/7 19/5 19/16  
 us [1] 3/13  
 USDOJ.GOV [1] 1/16  
 using [1] 26/14

V  
 valid [1] 5/10  
 variety [1] 11/5  
 various [2] 11/19 20/19  
 Venezuela [7] 18/8 21/8 21/17 21/21  
 22/1 24/2 24/4  
 Venezuelan [1] 22/9  
 very [3] 8/8 17/8 19/21  
 VICE [1] 1/21  
 violates [1] 11/19

W  
 wait [2] 12/2 12/12  
 want [7] 2/5 3/13 5/21 5/22 5/24 20/13  
 24/20  
 wanted [1] 26/21  
 warrant [1] 4/14  
 was [7] 10/4 10/5 13/18 17/6 19/11  
 22/16 26/5  
 we [22] 3/11 3/18 5/13 6/6 10/23 13/2  
 15/3 15/10 16/7 18/8 18/22 22/11 23/7  
 23/10 23/12 23/13 24/6 24/9 24/15  
 24/16 26/13 26/16  
 we're [4] 10/21 13/17 14/9 18/23  
 we've [1] 18/6  
 week [1] 27/4  
 weekends [1] 20/5  
 welcome [1] 15/4  
 Well [2] 14/11 23/7  
 were [5] 4/22 19/15 22/12 22/12 22/17  
 what [30]  
 What's [3] 3/6 9/20 19/6  
 whatsoever [1] 10/14  
 when [2] 5/23 15/12  
 where [3] 11/1 20/3 24/3  
 wherever [1] 6/16  
 whether [20] 3/8 5/10 7/1 9/3 9/13 9/14  
 9/22 10/5 11/8 11/19 13/13 13/13  
 14/19 14/23 15/21 19/6 19/24 22/22  
 23/9 24/5  
 which [17] 4/23 4/24 4/25 5/2 5/5 5/15  
 8/7 11/7 13/12 16/4 16/23 19/18 24/22  
 24/22 25/6 25/10 25/14  
 whichever [1] 6/18

while [6] 3/3 15/9 18/20 20/18 20/18  
 21/75  
 who [10] 2/6 2/10 2/20 10/23 16/14  
 17/21 17/22 18/7 19/20 22/9  
 whoever [1] 2/12  
 whole [2] 15/12 15/19  
 will [25] 2/24 4/2 4/5 6/14 6/15 7/6 8/22  
 9/2 9/3 9/10 13/4 14/22 19/6 22/19  
 25/8 25/10 25/10 25/11 25/14 26/5  
 26/9 26/16 26/17 26/19 27/3  
 willing [1] 21/20  
 wish [1] 25/24  
 within [7] 6/7 6/25 18/10 19/10 21/24  
 24/4 24/24  
 without [2] 10/7 23/16  
 words [4] 8/13 9/23 11/9 11/19  
 would [48]  
 writ [1] 11/18  
 Writs [5] 20/22 22/24 23/2 23/9 25/17  
 written [1] 25/11

Y  
 Y.A.P.A [1] 1/4  
 year [1] 21/24  
 yes [7] 2/9 2/19 20/24 21/19 25/1 25/22  
 26/20  
 yesterday [2] 22/16 24/22  
 yet [2] 3/21 8/21  
 YORK [1] 1/19  
 you [44]  
 you're [3] 12/14 12/18 17/8  
 you've [5] 8/17 12/17 13/5 17/21 18/10  
 your [58]