

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

A.A.R.P., *et al.*,

*Petitioners–Plaintiffs,*

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States, *et al.*,

*Respondents–Defendants.*

Case No. 1:25-cv-59-H

**EMERGENCY MOTION FOR AN IMMEDIATE STATUS CONFERENCE**

Petitioners make this emergency motion for an immediate status conference based on their filing early this morning regarding notices distributed to class members under the Alien Enemies Act and imminent removal flights under the AEA. *See* ECF No. 30 (Petitioners-Plaintiffs’ Renewed Emergency Application for Temporary Restraining Order). Plaintiffs have obtained through proposed class members two copies of the Notice that is being issued; they are attached to this emergency motion. The Notice is in English, does not say that one can contest the designation under the AEA, and does not state a timeframe for when the removal will occur. **Plaintiffs re-emphasize that proposed class members are being told that they will be imminently removed under the AEA, as soon as tonight.** Attached to this motion are two additional attorney declarations, one describing how another Venezuelan national at Bluebonnet has received such a notice that he refused to sign and then being taken away (Collins Decl.) and the other relaying how five Venezuelan men last night were told they had no choice to sign and would be deported (Petty Decl.). The last declaration is from a Venezuelan man with Temporary

Protected Status who nevertheless received an Alien Enemies Act Notice, and how around 30 other people have received notices (RJRS Decl.).

Petitioners' counsel requested the government's position on this motion for an immediate status conference. The government responded: "The government maintains that neither AARP nor WMM are at imminent risk of removal and that class certification is inappropriate. Thus, the government opposes an immediate status conference as unnecessary at this time."

Petitioners also requested the time by which the government intended to respond to the renewed emergency application for a temporary restraining order. The government stated that intends to file a response in opposition to the motion "at the appropriate time." It declined to specify further.

If the Court does not issue a TRO by 1:30 pm CT or hold a status conference to obtain the government's position as to the renewed emergency application for a TRO, and whether it is imminently removing the proposed class, Plaintiffs intend to seek emergency relief from the Fifth Circuit.

Dated: April 18, 2025

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Respectfully submitted,

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*\*Pro hac vice applications*

*forthcoming*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 18, 2025, a true and correct copy of the foregoing document was electronically filed via the Court's CM/ECF system which sends notice of electronic filing to all counsel of record.

Dated: April 18, 2025

/s/ Lee Gelernt

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