

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

D.A., T.L., I.O., D.S., and K.S.;

Plaintiffs,

v.

KRISTI NOEM, Secretary of Homeland Security, in her official capacity; TODD LYONS, Acting Director, U.S. Immigration and Customs Enforcement, in his official capacity; PAMELA BONDI, Attorney General, in her official capacity; and MARCO RUBIO, Secretary of State, in his official capacity

Defendants.

Civil Action No. 1:25-cv-03135

NOTICE TO COURT REGARDING STATUS OF PLAINTIFFS

Plaintiffs respectfully submit this Notice to the Court regarding the status of the four Plaintiffs requesting a TRO. The Court still has time to enter a Temporary Restraining Order to preserve the status quo. Counsel last communicated with Plaintiffs at 10:15 A.M. EDT (2:15 P.M. UTC), at which time Plaintiffs remained at Dema Camp, in Ghana. However, on information and belief, Plaintiffs face imminent removal.

Furthermore, as of the time of filing, Plaintiffs are now denied access to the Internet by camp officials. Previously, Counsel had been able to communicate with Plaintiffs intermittently through Plaintiffs' periodic Internet access on a shared cellular device. That is no longer the case. *See* Ex. A (Decl. of Wife of D.A.). On information and belief, Plaintiffs are being denied Internet access specifically because of their prior communications with Counsel and as a result of the instant lawsuit. Counsel retains limited ability to communicate with Plaintiffs via the cellular

device, paid for by D.A.'s wife, but reception is unreliable, the voice quality is limited, and calls cost \$3.00 per minute, making extensive communication impracticable.

Dated: September 15, 2025

Respectfully submitted,

/s/ Noah Baron.

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