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

THIRD 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. Counsel last communicated with Plaintiffs at 6:41 P.M. EDT (10:41 P.M. UTC), at which time Plaintiffs remained at Dema Camp, in Ghana. However, Plaintiffs believe they still face imminent removal for the reasons set forth in Plaintiffs' prior filings and (incorrect) statements earlier today from Ghanaian officials that Plaintiffs have *already* been removed to their countries of origin. Plaintiffs' counsel will advise the Court if they learn that Plaintiffs have been removed.

Dated: September 15, 2025 Respectfully submitted,
/s/Noah Baron

¹ See Edward Acquah et al., *Immigrants deported from US to Ghana are sent home, where lawyers say some could face torture*, AP (Sept. 15, 2025), https://apnews.com/article/us-ghana-deported-migrants-4b8e307a080735175229fd37fa6929c2.

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** Pro bono representation certificates forthcoming