

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PABLO MORENO GONZALEZ, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 25-cv-13323
	)	
KRISTI NOEM, Secretary of the U.S.	)	Class Action
Department of Homeland Security, in her	)	
official capacity, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

[PROPOSED] TEMPORARY RESTRAINING ORDER

Plaintiffs, having moved for a temporary restraining order, for a preliminary injunction, and for certification of a class of similarly situated individuals, and the Court having concluded that Plaintiffs and members of the putative Class have suffered, and are likely to suffer, irreparable harm absent the temporary relief granted herein, that they are likely to prevail on the merits of their claims, that the balance of the equities tips in their favor, and that the public interest lies in issuing a temporary restraining order, it is hereby

ORDERED, that each of the Defendants, including their officers, agents, servants, employees, and attorneys, and all persons in active concert or participation with any of the foregoing who receive actual notice of this Order, by personal service or otherwise, are ordered and enjoined, pending earlier of (a) the determination of Plaintiffs' motion for a preliminary injunction and (b) 11:59 p.m. on November 13, 2025, as follows:

Mandatory baseline detention conditions

1. They shall ensure that no person detained at the ICE facility in Broadview, Illinois (hereinafter "Detainee"), is held or detained in any hold room or other room, cell or other space (collectively referred to as a "Hold Room")

- (a) having a floor area (exclusive of floor area within 8 feet from any toilet) less than 50 square feet multiplied by the number of such Detainees held therein;
- (b) that is not furnished with a clean bedding mat and bedding for each Detainee held overnight;
- (c) that is not cleaned thoroughly at least three times each day;

- (d) that is not furnished with adequate supplies of soap, towels, toilet paper, oral hygiene products (including toothbrushes and toothpaste) and menstrual products;
- (e) that:
 - i. has access to less than one operable shower for every 12 Detainees,
 - ii. does not provide each Detainee the ability to shower at least every other day; or
 - iii. does not provide each Detainee the ability to shower without being viewed by staff or Detainees of a different gender;
- (f) that has access to less than one toilet or urinal for every 12 male Detainees (where at least half are toilets), or that has access to less than one toilet for every eight female Detainees, where the toilets cannot be observed by other Detainees, Defendants' officers, or staff;
- (g) from which a Detainee is not able to obtain food that
 - i. includes at least three full meals per day,
 - ii. is a nutritionally adequate diet that meets, at minimum, the U.S. Recommended Daily Allowances,
 - iii. is consistent with a Detainee's particular religious and medical dietary needs, and
 - iv. that is prepared and presented in a sanitary and hygienic manner;
- (h) in which a detainee is provided less than six 16-ounce bottles of potable water per day, or the equivalent amount of bottled water;
- (i) from which Detainees are not provided with means of making confidential, unmonitored, unrecorded, temporally unrestricted, and free telephone calls to legal representatives and prospective legal representatives, which means allowing for connection with outside interpretation services during the call, within three hours after being detained (or sooner, if transfer is expected within three hours of arrival) and at least once during each subsequent 12 hour period while they are detained, together with the ability to schedule legal calls with legal representatives and prospective legal representatives within 3 hours of a request made within the period 9 a.m. to 5 p.m. and within 8 hours of a request made outside those hours;
- (j) for which there is less than one private land line telephone dedicated solely to accommodating Detainee legal calls for each five or fewer Detainees.

Notice of Rights/Rights Retained by Detainees

2. They shall ensure that every Detainee held in a Hold Room shall, within one hour after their arrival in a Hold Room, be given a printed Notice of Rights stating that the Detainee has the following rights, which Defendants shall ensure are respected and complied with:

- (a) to engage and consult with legal representatives or prospective legal representatives;
- (b) to have confidential, unmonitored, unrecorded, temporally unrestricted, and free legal telephone calls with legal representatives (with interpreters for non-English speaking Detainees) within 3 hours of being detained and at least once during each subsequent 12-hour period while they are detained;
- (c) to receive a list of immigration attorneys and legal resources with phone numbers, in English and in Spanish, at or before they receive a telephone call to a legal representative;
- (d) to schedule confidential legal calls with legal representatives or prospective legal representatives within 3 hours of a request made within the period 9 a.m. to 5 p.m. and within 8 hours of a request made outside those hours;
- (e) to request and, promptly upon request, to be provided with clean clothing and with a private area for the purpose of changing clothing;
- (f) to request and -- if sufficient requested materials are not available in the Hold Room -- promptly to be provided without charge with soap, towels, toilet paper, oral hygiene products (including toothbrushes and toothpaste) and menstrual products;
- (g) to request and be provided with a shower at least once every other day in a location where the Detainee cannot be observed by Defendants' officers, staff, or Detainees of a different gender;
- (h) to request and be provided without charge with professional services of licensed medical and/or mental health personnel between the hours of 7 a.m. and 9:30 p.m. and, in case of emergency, during all other periods;
- (i) to retain throughout their detention personal inhaled medication in their possession at the time of arrest and to receive and retain in their possession throughout their detention such inhaled medication brought for them by family members or other legal representative(s) to the Broadview facility;
- (j) to have prompt access to other such prescribed medication from licensed medical personnel, one or more of whom, as necessary for the well-being of Detainees, shall be on the premises of the ICE facility in Broadview at all times of the day and night;
- (k) to request and, promptly upon request, to be provided with an additional blanket or blankets;
- (l) to request and, promptly upon request, to be provided with additional bottled water;

- (m) to request and to be provided with food that is consistent with the Detainee's religious and medical dietary needs; and
- (n) to request, and promptly upon request, to be provided with one additional meal per day.

3. A copy of this Order, in English and in Spanish, shall be printed and placed on the wall in every Hold Room within the facility. A Spanish legal translation of this Order will be provided by Plaintiffs' counsel for Defendants to place in the Hold Rooms.

Inspection of Premises

4. Plaintiffs' counsel, together with an expert and photographer (with photographic equipment), shall be permitted to inspect, survey, and photograph the ICE facility in Broadview as set forth in Plaintiffs' Motion for Expedited Discovery and the Expedited Request for Inspection contained in Exhibit A to that Motion. Further inspections by Plaintiffs' counsel, with or without an expert, may be made at Plaintiffs' request at least once every 14 days thereafter or until further order of the Court. Such inspections shall take place during regular business hours. Defendants may not interfere with such inspections or impede access to the portions of the building at the ICE facility in Broadview that are used for Detainee operations, as described in the Expedited Request for Inspection. Defendants shall permit such inspection upon 4 hours notice by Plaintiffs' counsel, provided such notice is given during ordinary business hours of 9 a.m. to 5 p.m.

Consequences if Detention Conditions in 1, 2 and 3 Are Violated: 12-hour limit on Detention

5. Defendants shall certify within 72 hours that they have come into compliance with all of the provisions of paragraphs 1, 2 and 3 above. If Defendants are unable to certify such compliance or if Defendants are in fact not in compliance, Defendants shall be prohibited from holding any Detainee at the Broadview ICE facility for more than 12 hours;

Online Detainee Locator System

6. Defendants shall ensure that the Online Detainee Locator System of Defendant Immigration and Customs Enforcement ("ICE") accurately identifies the location of each Detainee in real time or as close thereto as is reasonably possible. In no circumstances shall a Detainee be held at the ICE facility in Broadview for more than three hours without having been logged into the Online Detainee Locator System.

Legal Representatives' Ability to Schedule and Make Calls and Visits

7. Defendants shall not move Plaintiffs outside the jurisdiction of Seventh Circuit Court of Appeals (Illinois, Indiana, Wisconsin).

8. Commencing no later than two days after the entry of this Order, Defendants shall ensure that:

- (a) A telephone number for legal representatives to call in order to schedule telephone calls or in-person visits with Detainees is conspicuously displayed on the ICE internet website;
- (b) the aforementioned telephone number is monitored and answered without undue delay from 9 a.m. until 5 p.m.;
- (c) a call or in-person visit with the relevant Detainee is scheduled for the date and time requested by the legal representative or as soon thereafter as is reasonably possible, provided that legal representatives will be permitted to schedule legal calls within three hours of a request made during business hours and that the facility will permit legal representative visits at least eight hours per day on weekdays and at least four hours per day on weekends and holidays;
- (d) the relevant Detainee is informed of the requested call or in-person visit with the Detainee and the scheduled date and time fixed for the call or in-person visit, and that the Detainee is provided with the means, capability, and access necessary to conduct a confidential, unmonitored, unrecorded, temporally unrestricted, free legal call or in-person visit as scheduled;
- (e) legal representatives are permitted access to the facility for the purpose of consulting with Detainees, and all legal representative visits with Detainees are conducted in private and confidential settings, so that Defendants' officers and staff cannot overhear or monitor those consultations.
- (f) legal representatives who present themselves at the ICE facility in Broadview to meet with a client or prospective client currently held there shall not be turned away and shall be permitted meet with their client within a reasonable amount of time, unless all legal representative visit rooms are fully occupied by other legal representatives visiting with clients, in which case legal representatives shall be afforded the opportunity either to wait for a room to become available or to schedule a visit pursuant to subparagraph (c) above.

Language Access

9. Defendants shall furnish the Notice of Rights required by paragraph 2 to each Detainee in English and Spanish. They shall provide to each Detainee who is not proficient in either English or Spanish, without charge, the Notice of Rights required by paragraph 2 and provide each such Detainee with access to and the services of an interpreter to translate the Notice of Rights into such Detainee's native tongue.

10. Defendants shall ensure that each Detainee who is illiterate or has limited English proficiency and speaks a language in which written material provided to such Detainee (including the Notice of Rights required by paragraph 2, a copy of this Order required by paragraph 3, and all

ICE, DHS, and facility-related information and communications) has not been translated into such Detainee's native language, is provided with an in-person or telephonic oral translation of such written material into such language.

Prohibition on Retaliation

11. Defendants shall not retaliate in any manner against Plaintiffs or any other member of the provisionally certified class (including in his or her immigration proceedings or in any other context) for complaining about any alleged violation of this Preliminary Injunction or the Temporary Restraining Order as corrected and modified, and shall not retaliate in any manner against any declarant or witness who has or will participate in this matter; and it is further

Security/Bond

12. This Order is conditioned upon the posting by or on behalf of Plaintiffs at or before 5 p.m. two days after the entry of this Order of a bond or other security in the amount of ten dollars.

Dated: October __, 2025

Issued at:

United States District Judge