

IN THE
Supreme Court of the United States

A.A.R.P. AND W.M.M,

Applicants,

— v. —

DONALD J. TRUMP, ET AL.,

Respondents.

MOTION FOR LEAVE TO FILE SUPPLEMENTAL APPENDIX UNDER SEAL

Cecillia D. Wang
Evelyn Danforth-Scott
Noelle Smith
Oscar Sarabia Roman
My Khanh Ngo
Cody Wofsy
Spencer Amdur
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
425 California Street, Suite 700
San Francisco, CA 94104

Brian Klosterboer
Thomas Busey-Clancy
Savannah Kumar
Charelle Lett
Ashley Harris
Sarah
Adriana Piñon
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF TEXAS
1018 Preston St.
Houston, TX 77002

Lee Gelernt
Counsel of Record
Daniel Galindo
Ashley Gorski
Patrick Toomey
Sidra Mahfooz
Omar Jadwat
Hina Shamsi
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
125 Broad Street, 18th Floor
New York, NY 10004
(212) 549-2500
lgelernt@aclu.org

Counsel for Applicant

Applicants write to alert the Court that the government revealed new, directly relevant information today in a declaration submitted at 2:13 p.m. CDT to the Southern District of Texas, which the government submitted directly to the court under seal. *See J.A.V. v. Trump*, No. 1:25-cv-072 (S.D. Tex. filed Apr. 23, 2025), ECF No. 45, Exhibit D ¶¶ 5, 11, 12 – Sealed Declaration of Carlos D. Cisneros Regarding the AEA Notice Procedures. The declaration concerns the amount of notice that the government is providing to individuals who are designated for removal under the Alien Enemies Act. Applicants intend to object to the declaration’s improper sealing in the district court, but because it is sealed, Applicants are not attaching the declaration or describing its contents on the public docket.

Respectfully submitted,

Cecillia D. Wang
Evelyn Danforth-Scott
Noelle Smith
Oscar Sarabia Roman
My Khanh Ngo
Cody Wofsy
Spencer Amdur
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
425 California Street, Suite 700
San Francisco, CA 94104

Brian Klosterboer
Thomas Busey-Clancy
Savannah Kumar
Charelle Lett
Ashley Harris
Sarah Corning
Adriana Piñon

Lee Gelernt
Counsel of Record
Daniel Galindo
Ashley Gorski
Patrick Toomey
Sidra Mahfooz
Omar Jadwat
Hina Shamsi
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
125 Broad Street, 18th Floor
New York, NY 10004
(212) 549-2500
lgelernt@aclu.org

AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF TEXAS
1018 Preston St.
Houston, TX 77002

Dated: April 23, 2025