

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA**

Arely Westley a/k/a Wilson Amilcar Velasquez-
Caballero,¹

Petitioner,

v.

Mellissa B. Harper, in her Official Capacity as
Field Office Director New Orleans ICE Field
Office; **Scott Ladwig**, in his Official Capacity as
Deputy Field Office Director, New Orleans ICE
Field Office; **Kristi Noem**, in her official capacity
as Secretary, U.S. Department of Homeland
Security; **U.S. Department of Homeland Security;**
and **U.S. Immigration and Customs
Enforcement,**

Respondents.

Case No.

PETITIONER'S NOTICE OF MOTION FOR A TEMPORARY RESTRAINING ORDER

Moving Party:

Petitioner

Place:

United States District Court
U.S. Courthouse
500 Poydras Street
New Orleans, LA 70130

Relief Sought:

Pursuant to Local Rule of Civil Procedure 65(b)(2), Petitioner respectfully moves the Court for a temporary restraining order pending adjudication of his Petition for a Writ of Habeas Corpus.

Papers Submitted in Support: Memorandum of Law

¹ Petitioner identifies as a trans-Latinx woman. She was born with the name Wilson Amilcar Velasquez-Caballero but officially changed her name to Arely Westley in 2022. Respondents in this proceeding identify Petitioner only as Wilson Amilcar Velasquez-Caballero and therefore both names are included in the caption.

Intent to Reply:

Petitioner respectfully requests the opportunity to respond to any responses filed by Respondents to the instant motion.

Date: February 1, 2025
New Orleans, Louisiana

Respectfully submitted,

/s/ Charles Andrew Perry
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*Pro hac vice applications forthcoming

† Not admitted in DC; working remotely from and admitted in Louisiana only

