Rebecca Hufstader, Esq.
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(732) 529-8236 *Pro Bono Attorneys for Petitioner*

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

)	Motion Day: May 19, 2025
Respondents.)	
YOLANDA PITTMAN, et al.,)	ELECTRONICALLY FILED
v.	j	(O'Hearn, J.)
Petitioner,)	CASE NO: 1:25-CV-2258
HORACIO MUNOZ-SAUCEDO,)	

MOTION FOR TEMPORARY RESTRAINING ORDER OR PRELIMINARY INJUNCTION

PLEASE TAKE NOTICE THAT Petitioner Horacio Munoz-Saucedo, through undersigned counsel, will move before the Honorable Judge Christine O'Hearn, United States District Court for the District of New Jersey, for a temporary restraining order (TRO) or preliminary injunction (PI) directing respondents to immediately release him from custody. Petitioner respectfully requests that the Court expedite consideration of this motion, for the reasons discussed in the Memorandum

of Law supporting this motion. In the alternative, Petitioner moves the court for release during the pendency of his Petition for Writ of Habeas Corpus (Dkt. 1) or to grant his Application for an Order to Show Cause (Dkt. 3), filed April 4, 2025.

In support of this motion, Petitioner will rely on the attached Memorandum of Law, and supporting documentary evidence, Exhibits A-B.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted with this motion. Oral Argument on this motion is specifically requested by Petitioner.

Dated: April 24, 2025 Edison, NJ

Respectfully Submitted,

/s/ Rebecca Hufstader

Rebecca Hufstader, Esq. Legal Services of New Jersey 100 Metroplex Drive, Suite 101 Edison, NJ 08817 (732) 529-8236 rhufstader@lsnj.org

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

HORACIO MUNOZ-SAUCEDO,)
Petitioner,) CASE NO: 1:25-CV-2258
V.) (O'Hearn, J.)
YOLANDA PITTMAN, et al., Respondents.) ELECTRONICALLY FILED

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is a person of such age and discretion as to be competent to serve papers, and that on April 24, 2025, she served a copy of the attached

MOTION FOR TEMPORARY RESTRAINING ORDER OR PRELIMINARY INJUNCTION

and the attached exhibits and memorandum of law, by electronic service pursuant to Local Rule 5.2 to the following individuals:

Frances Bajada U.S. Attorney's Office 970 Broad Street Newark, NJ 07102 Frances.bajada@usdoj.gov

John Francis Basiak U.S. Attorney's Office 402 E. State Street, Room 430 Trenton, NJ 08608 John.basiak@usdoj.gov

> /s/ Rebecca Hufstader Rebecca Hufstader, Esq.