

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
COLUMBUS DIVISION

E.A.A.P.,

*Petitioner,*

v.

Terrence DICKERSON, et al.,

*Respondents.*

Case No.: 4:25-cv-00136-CDL-AGH

**PETITIONER'S EMERGENCY  
MOTION FOR A TEMPORARY  
RESTRAINING ORDER**

Pursuant to Federal Rule of Civil Procedure 65, Petitioner E.A.A.P. ("Petitioner" or "Mr. P."), respectfully requests that the Court issue an order requiring Respondents to immediately release Petitioner. In the alternative, Petitioner requests that the Court issue an order barring Respondents from transferring him outside this District. Petitioner's motion is supported by the accompanying memorandum of law and exhibits. Petitioner respectfully requests a hearing on his emergency motion.

As explained in the accompanying Memorandum of Law in Support of Emergency Motion for a Temporary Restraining Order, Petitioner is likely to succeed on his claims that Respondents, by detaining him despite clear statutory provisions denying detention of individuals with Petitioner's status, violated Petitioner's rights under the Fifth Amendment of the U.S. Constitution. Petitioner's continued detention irreparably harms Petitioner, and the balance of the equities and the public interest heavily favor relief.

Counsel for Petitioner provided notice of Petitioner's intent to file this motion by email to:

- Assistant U.S. Attorney for the Middle District of Georgia, Roger Grantham, Jr.

For the reasons stated above and in the accompanying documents, Petitioner respectfully requests that this Court grant the emergency motion for temporary restraining order.

Dated: April 27, 2025

Respectfully submitted,

/s/ Stephanie M. Alvarez-Jones  
Stephanie M. Alvarez-Jones  
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*\*pro hac vice admission applications  
forthcoming*

*Counsel for Petitioner*

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on this date, I uploaded the foregoing, along with all attachments thereto, to this Court's CM/ECF system, which will send a Notice of Electronic Filing (NEF) to all counsel of record.

I have emailed copies of these documents to Roger Grantham, Assistant U.S. Attorney for the Middle District of Georgia, at [roger.grantham@usdoj.gov](mailto:roger.grantham@usdoj.gov).

Respectfully submitted,

Date: April 27, 2025

/s/ Stephanie M. Alvarez-Jones  
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