

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

JOHN ROE,  
*Petitioner,*

v.

LEONARD ODDO, *in his official capacity as Warden of Moshannon Valley Processing Center*; BRIAN MCSHANE, *in his official capacity as Acting Field Office Director of the Immigration and Customs Enforcement, Enforcement and Removal Operations Philadelphia Field Office*; KRISTI NOEM, *in her official capacity as Secretary of the Department of Homeland Security*; and PAM BONDI, *in her official capacity as Attorney General of the United States,*

*Respondents.*

Civil Action No.

**PETITIONER JOHN ROE'S  
NOTICE OF MOTION FOR A  
TEMPORARY RESTRAINING ORDER  
AND/OR PRELIMINARY INJUNCTION**

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE** that on April 30, 2025, or as soon as counsel may be heard, the undersigned attorneys for Petitioner John Roe shall move before an Honorable Judge of the United States District Court for the Western District of Pennsylvania, for a Temporary Restraining Order and/or Preliminary Injunction.

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion, Petitioner rely upon the accompanying (1) Memorandum of Law; (2) Declaration of John Roe; and (3) all exhibits accompanying Petitioner's Verified Habeas Petition.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith pursuant to Local Civil Rule 7.D.

Dated: April 30, 2025

/s/ Shira Wisotsky  
Shira Wisotsky (NJ 243172017)  
Nuria Iturbe Cosano\*  
Raquiba Huq  
**LEGAL SERVICES OF NEW JERSEY**  
100 Metroplex Drive, Suite 402  
Edison, New Jersey 08817  
Tel: 908-882-2665  
SWisotsky@lsnj.org

Jessica Rofe\*  
Rutgers Law School  
Center for Law and Justice  
Constitutional Rights Clinic  
123 Washington Street  
Newark, New Jersey 07102  
Tel: 973-353-3239  
jessica.rofe@rutgers.edu

*Pro Bono Counsel for Petitioner*

*\*applications for admission forthcoming*