

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

HENRRY VILLATORO SANTOS

Petitioner,

v.

RUSSELL HOTT, *in his official capacity as Field Office Director of the Immigration and Customs Enforcement, Enforcement and Removal Operations Washington 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.

Case No. 1:25-cv-735

**EMERGENCY MOTION FOR INJUNCTIVE RELIEF
UNDER ALL WRITS ACT, 28 U.S.C. § 1651,
AND/OR FEDERAL RULE OF CIVIL PROCEDURE 65**

Petitioner Henry Villatoro Santos (“Mr. Villatoro” or “Petitioner”) moves the Court, pursuant to the All Writs Act, 28 U.S.C. § 1651, to urgently enter an order enjoining 1) his removal from the United States pending resolution of his habeas petition and 2) his transfer outside of the jurisdiction of the U.S. District Court for the Eastern District of Virginia. Alternatively, Mr. Villatoro seeks a Temporary Restraining Order (TRO) under Fed. R. Civ. P. 65 providing the same injunctive relief.

Respectfully submitted,

Dated: April 30, 2025

ELSAYED LAW PLLC

s/ Muhammad Elsayed
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CERTIFICATE OF SERVICE

I, undersigned counsel, hereby certify that on this date, I filed this pleading and all attachments using the CM/ECF system, which will send a notice of electronic filing (NEM) to all counsel of record. Immediately upon filing, I furthermore emailed a courtesy copy of this petition to Dennis Barghaan, Deputy Chief of the Civil Division of the U.S. Attorney's Office for the Eastern District of Virginia.

Dated: April 30, 2025

/s/ Muhammad Elsayed
Muhammad Elsayed

Counsel for Petitioner