

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
WAYCROSS DIVISION**

DORIAN ABAD ABROSI,

Petitioner,

v.

WARDEN OF FOLKSTON ICE
PROCESSING CENTER, *et al.*

Respondents.

Case No. CV 525-013

**PETITIONER'S MOTION FOR TEMPORARY RESTRAINING ORDER OR
PRELIMINARY INJUNCTION**

In light of Petitioner's prolonged immigration detention in violation of due process and his urgent medical issues, Petitioner respectfully moves this Court for a temporary restraining order or preliminary injunction requiring Respondents to release Petitioner during the pendency of his habeas petition, Dkt. No. 1. A memorandum of law accompanies this motion.

Immediately upon filing, counsel for Petitioner emailed a copy of this motion, memorandum of law, and habeas petition to Woelke Leithart, Assistant U.S. Attorney for the Savannah Division, who typically represents the Government in immigration habeas petitions.

DATED: February 5, 2025

Respectfully submitted,

/s/ Felix A. Montanez

/s/ Ian Austin Rose

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Seeking Pro Hac Vice Admission

CERTIFICATE OF SERVICE

I hereby certify that on this date, I uploaded the foregoing Motion for TRO or PI to this Court's CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

Dated: February 5, 2025

Respectfully submitted,

/s/ Felix Montanez