UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

)	
CANDIDA RAMIREZ LOPEZ,)	
)	
Plaintiff-Petitioner,)	
)	
V.)	
)	
DONALD J. TRUMP, in his official capacity as)	NOTICE OF EMERGENCY MOTION
President of the United States; JUDITH)	FOR A TEMPORARY RESTRAINING
ALMODOVAR, in her official capacity as)	ORDER AND PRELIMINARY
Acting Field Office Director of New York,)	INJUNCTION
Immigration and Customs Enforcement;)	
TODD LYONS, Acting Director, U.S.)	Case No. 1:25-cv-04826
Immigration and Customs Enforcement,)	
KRISTI NOEM, in her official capacity as)	
Secretary of the United States Department of)	
Homeland Security; U.S. DEPARTMENT OF)	
HOMELAND SECURITY, and U.S.)	
IMMIGRATION AND CUSTOMS)	
ENFORCMENT)	
Defendants-Respondents.)	

PETITIONER'S NOTICE OF EMERGENCY MOTION FOR A TEMPORARY RESTRAINING ORDER

Moving Party:

Plaintiff-Petitioner

Place:

United States District Court for Southern District of New

York

Daniel Patrick Moynihan 500 Pearl St. Courthouse New York, New York

Relief Sought:

Pursuant to Federal Rules of Civil Procedure 65(b)(2) ("Fed. R. Civ. P."), Petitioner respectfully moves the Court for a temporary restraining order and preliminary

injunction pending adjudication of her Petition for Writ

of Habeas Corpus ("Petition")

Papers Submitted in Support:

Memorandum of Law and Exhibits thereto

Intent to Reply:

Petitioner respectfully requests the opportunity to respond to any responses filed by Respondents to the

instant motion.

Dated: New York, NY June 10, 2025

/s/ Carolyn M. Norton
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