

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

ROBERTO CHAVEZ BARRIOS,

Petitioner-Plaintiff,

v.

GARRETT J. RIPA, in his official capacity as
Director of Miami Field Office, U.S. Immigration
and Customs Enforcement; **TODD LYONS**,
in his official capacity as Acting Director of
U.S. Immigration and Customs Enforcement;
KRISTI NOEM, in her official capacity as
Secretary of the U.S. Department of Homeland
Security; **U.S. DEPARTMENT OF
HOMELAND SECURITY**; and **U.S.
IMMIGRATION AND
CUSTOMS ENFORCEMENT**,

Respondents-Defendants.

Case No. 1:25-cv-22644-DPG

NOTICE OF EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER

PLEASE TAKE NOTICE that upon the Petitioner-Plaintiff's Memorandum of Law in Support of Emergency Motion for Temporary Restraining Order, the Declaration of Stephanie E. Norton, and all prior proceedings and submissions, Petitioner-Plaintiff hereby moves this Court on an emergency basis for a temporary restraining order, enjoining Respondent-Defendants from transferring him out of the Southern District of Florida or removing him from the United States during the Court's adjudication of his petition for a writ of habeas corpus and complaint. As evidence indicates that transfer or removal could be effected within a matter of hours, Petitioner-Plaintiff respectfully requests a ruling from the Court as soon as possible.

CERTIFICATION OF EMERGENCY

I hereby certify that, as a member of the Bar of this Court, I have carefully examined this matter and it is a true emergency and that the urgency has not been caused by my or the party's own dilatory conduct.

After reviewing the facts and researching applicable legal principles, I certify that this motion in fact presents a true emergency (as opposed to a matter that may need only expedited treatment) and requires an immediate ruling because the Court would not be able to provide meaningful relief to a critical, non-routine issue after the expiration of seven days. I understand that an unwarranted certification may lead to sanctions.

I further certify that I have made a bona fide effort to resolve this matter without the necessity of emergency action.

Dated: June 11, 2025

Respectfully submitted,

s/ Andrea Jacoski

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s/ Stephanie E. Norton

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*Application for Admission
Pro Hac Vice pending

Counsel for Petitioner-Plaintiff