

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
LOUISVILLE DIVISION

Vraj Dilipbhai PATEL (A )

Petitioner,

v.

Case No. 3:25-cv-00373-RGJ

JEFF TINDALL, Jailer, Oldham County
Detention Center;

SAMUEL OLSON, Field Office Director,
Chicago Field Office, Immigration and
Customs Enforcement;

KRISTI NOEM, Secretary of the U.S. Department
of Homeland Security; and

PAMELA BONDI, Attorney General of the
United States,
Respondents.

**MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY
INJUNCTION**

Petitioner, Vraj Dilipbhai Patel, by and through undersigned counsel, files for a
Temporary Restraining Order to be followed by a preliminary injunction pursuant to Rule 65 of
the Federal Rules of Civil Procedure. In support thereof state as follows:

1. As Petitioner notes in his Petition for Writ of Habeas Corpus (Dkt. 1), which is hereby
incorporated by reference, Petitioner is currently at risk of being involuntarily moved to a
new immigration detention facility and involuntarily removed from the United States
because the Respondents have detained him and have allegedly placed Petitioner in
expedited removal proceedings. Petitioner is also being severely harmed in other ways as
noted in the Petition for Writ of Habeas Corpus.

2. The actions of the Respondents violate the due process clause of the Fifth Amendment to the United States Constitution and the Immigration and Nationality Act.
3. Petitioner is being caused irreparable harm for which there is no adequate remedy at law.
4. The harm that Plaintiff is being caused and is facing in the future far outweigh any harm that a temporary restraining order will cause the Respondents.
5. The public interest will be served by the issuance of a temporary restraining order.
6. In addition to his Motion for Temporary Restraining Order and Preliminary Injunction, Petitioner separately submits his memorandum of law, which is also incorporated by reference.

WHEREFORE, Petitioner requests that this Court enter a temporary restraining order that enjoin Respondents from directly or indirectly enforcing, implementing, or otherwise taking any action or imposing any legal consequences- including moving or removing Petitioner- as a result of that decision pending the instant case, and after a briefing and hearing enter a preliminary injunction continuing the temporary restraining order, and for all other proper relief.

Dated: June 26, 2025

Respectfully Submitted,

Vraj Dilipbhai PATEL

By: /s/ Maya A. Flores

One of his attorneys

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*Pro hac vice motion pending

CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2025, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to counsel for the Respondents.

/s/ Maya A. Flores
Maya A. Flores
Kriezelman Burton & Associates