## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

J.J.O.H.,

Petitioner,

V.

PAUL ARTETA in his official capacity as Sheriff of Orange County, New York and Warden, Orange County Jail; WILLIAM JOYCE, in his official capacity as Acting Field Office Director, New York Field Office, United States Immigration and Customs Enforcement; TODD M. LYONS, in his official capacity as Acting Director, United States Immigration and Customs Enforcement; KRISTI NOEM, in her official capacity as Secretary of Homeland Security; PAMELA BONDI, in her official capacity as United States Attorney General,

Respondents.

PETITIONER'S MOTION FOR A TEMPORARY RESTRAINING ORDER AND A PRELIMINARY INJUNCTION

No. 25-cy-5278

## PETITIONER'S MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

Petitioner J.J.O.H. moves the Court pursuant to Fed. R. Civ. Pro. 65 to issue a temporary restraining order and preliminary injunction ordering Respondents to immediately release Petitioner from their custody and to furnish his transportation from Orange County Jail to New York City.

In support of the motion, Petitioner files the attached Memorandum of Law and the exhibits thereto.

Counsel for Petitioner provided notice of Petitioner's intent to file this motion to counsel

for Respondents at the United States Attorney's Office for the Southern District of New York by email and informed them that Petitioner would agree to a response date for Respondents of July 10, 2025.

Dated: July 3, 2025

Respectfully submitted,

/s/ Alyssa Briody
Alyssa Briody
Lucas Marquez
BROOKLYN DEFENDER SERVICES
177 Livingston Street, 7th Floor
Brooklyn, NY 11201
Tel: 718-254-0700

Email: abriody@bds.org Email:lmmarquez@bds.org