

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

FRICO JEAN (A [REDACTED]),

Petitioner,

v.

BRYAN PATTERSON, Warden, Pine Prairie
ICE Processing Center, MELISSA HARPER,
Field Office Director, New Orleans Field Office
U.S. Immigration & Customs Enforcement;
TODD M. LYONS Acting Director, U.S.
Immigration & Customs Enforcement; and
KRISTI NOEM, Secretary, Department of
Homeland Security.

Respondents.

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

Petitioner, Frico Jean, 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, he states 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 removed from the United States despite his Temporary Protected Status. Petitioner is also being severely harmed in other ways as noted in the Petition for Writ of Habeas Corpus.
2. The Detainee Locator of Immigration and Customs Enforcement shows that Petitioner was moved today to a staging facility, which is often used for deportation flights.
3. Petitioner is at immediate risk of removal and therefore brings this emergency motion.

4. 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.
5. Petitioner is being caused irreparable harm for which there is no adequate remedy at law.
6. The harm that Plaintiff is being caused and is facing in the future far outweighs any harm that a temporary restraining order will cause the Respondents.
7. The public interest will be served by the issuance of a temporary restraining order.
8. 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 this Honorable Court issue an emergency temporary restraining order to (1) enjoin Respondents from moving Petitioner to a new immigration detention center within the United States and its territories, unless it is to release him closer to his home in Illinois and (2) enjoin Respondents from removing Petitioner from the United States, at least until conclusion of his habeas proceedings before this Honorable Court.

Dated: July 15, 2025

Respectfully Submitted,

By: s/ Erin C. Cobb

One of his attorneys

Erin C. Cobb
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ATTORNEYS FOR FRICO JEAN

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 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. I certify that on the same date I have emailed a courtesy copy to the U.S. Attorney's Office for the Western District of Louisiana. I hereby certify that I have mailed by United States Postal Service this filing to the following non-CM/ECF participants:

BRYAN PATTERSON,
Warden, Pine Prairie ICE Processing Center,
1133 Hampton Dupre Road
Pine Prairie, LA 70576

/s/ Erin C. Cobb
Erin C. Cobb
Kriezelman Burton & Associates