

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

ALIREZA KHALEGHI AFROUZ,
Plaintiff,

v.

CARLOS D. CISNEROS, et al.,
Defendants.

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**CIVIL ACTION
1:25 - cv - 152**

URGENT MOTION FOR TEMPORARY RESTRAINING ORDER

Plaintiff, Alireza Khaleghi Afrouz (“Mr. Khaleghi Afrouz”), by and through undersigned counsel, filed a a Petition for a Writ of Habeas Corpus with a Complaint under the APA for Declaratory and Injunctive Relief on July 9, 2025. Dkt. No. 1. Now in conjunction with that filing he urgently seeks a temporary restraining order (TRO) requiring that Defendants’ stay any removal of Mr. Khaleghi Afrouz from the jurisdiction of this court until the adjudication of the pending Complaint is complete. Plaintiff files with this Motion for a Temporary Restraining Order a Memorandum in Support.

Mr. Kahlegghi Afrouz submits that he has shown (1) a substantial likelihood that he will prevail on the merits of his claim; (2) a substantial likelihood that he will suffer irreparable injury for which there is no adequate remedy in law if the injunction is not granted; (3) that his threatened injury outweighs the threat of harm to the parties whom he seeks to enjoin; and(4) that granting a temporary restraining order will not disserve the public interest.

A temporary restraining order presents no monetary risks to the Defendants, therefore, Mr. Tendo requests that no bond, or a bond of \$1.00 be set if required. Fed.R.Civ.P. 65(c).

For the reasons stated in the Memorandum, Mr. Khaleghi Afrouz, by and through counsel, urges this Court to issue a Temporary Restraining Order to assure he is not removed to a location unknown. The matter is urgent, since an attempt to remove Mr. Khaleghi Afrouz to Iran was made on or about July 1, 2025, but was aborted in Houston because the connecting flight to Tehran through Doha was cancelled. On or about July 15, 2025, Mr. Alireza Khaleghi Afrouz was again taken from PIDC and was transferred to a destination unknown. On July 15, 2025, he appeared on the detainee locator system as being at the Alexandria Staging Area. On July 16, 2025, he was listed as being at the Adam County Detention Center in Natchez, Mississippi, and remains there for now.

Respectfully submitted July 17, 2025,

s// Cathy J. Potter

Cathy J. Potter

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CERTIFICATION

Counsel for Plaintiff certifies that she notified Counsel for the Defendants of the intent to file this Motion for a Temporary Restraining Order by e-mail on June 14, 2025.

A copy of this application, with all related filings was sent by electronic mail to Assistant U.S. Attorney Nancy Masso at Nancy.Masso@usdoj.gov on July 17, 2025..

s// Cathy J. Potter

Cathy J. Potter