

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

-----X
Jigar Rajesh Kumar PATEL,

Petitioner,

Case No. 3:25-cv-01459-SAC

- against -

Pamela BONDI, et. al.,

Respondents.
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EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER

PLEASE TAKE NOTICE that as soon as counsel may be heard, the undersigned will move the Court, seeking a Temporary Restraining Order ("TRO") in the form attached hereto, and asking that this matter be set down for a hearing to convert those temporary restraints into a Preliminary Injunction pursuant to Fed. R. Civ. P. 65. In support of this emergency motion, Petitioner asserts through counsel that ICE ERO is at this moment taking action to move him out of this judicial district and to put him on a plane to India.

WHEREFORE, Petitioner respectfully requests that this Court grant this Emergency Motion for a Temporary Restraining Order and issue an Order: (1) enjoining Respondents from moving the Petitioner to a detention facility outside Pennsylvania; (2) enjoining Respondents from taking action to physically remove Petitioner from the United States of America.

Respectfully submitted,



/s/ Judy Resnick

Judy Resnick, Esq.
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Date: November 23, 2025

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

-----X
Jigar Rajesh Kumar PATEL,

Petitioner,

Case No. 3:25-cv-01459-SAC

v.

Pamela BONDI, et. al.,

Respondents.

-----X

TEMPORARY RESTRAINING ORDER

ORDERED, that a Temporary Restraining Order be issued forthwith, barring and enjoining the respondents/defendants, their agents and subordinates from the following actions: enforcing removal of the petitioner from the United States of America; moving him from the jurisdiction of the United States District Court for the Middle District of Pennsylvania; until a full and complete hearing on the merits of his Petition for Writ of Habeas Corpus, and any extensions and continuances thereof, and any appeal therefrom has been entertained and exhausted.

SEAN A. CAMONI
Honorable United States Magistrate Judge

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

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CERTIFICATE OF SERVICE

I certify that on the date given below, a copy of the following document:

EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER

was served upon Counsel for Respondents at the following address:

Gerard T. Donahue, Esq., Assistant United States Attorney
Office of the U.S. Attorney for the Middle District of Pennsylvania
235 N. Washington Avenue, Suite 311
Scranton, PA 18503

by electronic service pursuant to Local Rule 5.7 and Standing Order 05-6, and 12.2, to the above individual, on date given below.

Date: November 23, 2025

Signature: _____



/s/ Judy Resnick

Judy Resnick, Esq.
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Email: resnickjudys @ gmail.com