

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION

ORTIZ-RIVERA,)
Petitioner,) Case No. 1:25-cv-01148
v.)
LYONS, et al.)
Respondents.)

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

Petitioner Jose Robert Ortiz-Rivera respectfully requests, in accordance with Local Rule 65.1, that this Honorable Court grant a temporary restraining order (“TRO”) and preliminary injunction against Respondents because, as demonstrated in the attached memorandum of law and other supporting documents, he is likely to suffer the irreparable harm of deportation without having had an opportunity to present his claims to an immigration judge in violation of his rights to due process.

Petitioner therefore requests an order enjoining Respondents from deporting him prior to the conclusion of removal proceedings and, then, only if the outcome of those proceedings is an order of removal.

Dated: August 10, 2025

Respectfully submitted,

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Attorneys for Plaintiff
** Pro hac vice applications forthcoming*

CERTIFICATE OF SERVICE PURSUANT TO LOCAL RULE 65.1

I hereby certify on August 10, 2025, I electronically filed the foregoing document, supporting documents, and proposed order with the Clerk of the Court using the CM/ECF system and that a courtesy copy of this Motion and all attachments thereto and the related Petition in this matter will be sent today, August 10, 2025, to the United States Attorney's Office for the Western District of Louisiana, at the following email addresses:

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Respectfully submitted,

/s/ Charles Andrew Perry

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