

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

FADEL ALI AL MASRI,

Petitioner,

v.

KRISTI NOEM, Secretary of the Department
of Homeland Security (“DHS”); **TODD**
LYONS, Acting Director of Immigration and
Customs Enforcement (“ICE”); **MIGUEL**
VERGARA, ICE Enforcement and Removal
Operations, Harlingen Field Office Director;
PAMELA BONDI, Attorney General of the
United States; and **WARDEN, EL VALLE**
DETENTION FACILITY,

Respondents.

CIVIL ACTION NO.: 7:25-cv-00407

**PETITIONER’S MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

Petitioner, by and through undersigned counsel, respectfully moves this Court pursuant to Federal Rule of Civil Procedure 65 for a Temporary Restraining Order (“TRO”) and Preliminary Injunction (“PI”) ordering his immediate release from detention, or alternatively requiring Respondents to facilitate his attendance at and completion of biometrics for his Temporary Protected Status (“TPS”) application, pending resolution of his habeas petition. In support of this motion, Mr. Al’Masri relies upon the attached memorandum of law.

In support of this motion, and in addition to the case pleadings, Petitioner submits the following supporting evidence attached hereto:

- Exhibit A: Declaration of Petitioner’s sister, Fatima Al Masri.
- Exhibit B: Declaration of Petitioner’s Counsel, Alexis Beshears.

- Exhibit C: Petitioner's USCIS biometrics appointment.

WHEREFORE, respectfully request the court to grant a Temporary Restraining Order enjoining Respondents from detaining Petitioner and ordering his immediate release, or alternatively, ordering Respondents to facilitate his TPS biometrics appointment without delay.

Respectfully submitted on the **11th** day of **SEPTEMBER 2025**.

s/Amro Elsayed

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Respectfully submitted on the 28th day of AUGUST 2025.

s/Amro Elsayed

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