

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

SEGUNDO ELOY GUAMAN GUASCO

Petitioner,

-against-

BRIAN MCSHANE, in his official capacity as acting Philadelphia Field Office Director for U.S. Immigration and Customs Enforcement, KRISTI NOEM, in her capacity as Secretary for the United States Department of Homeland Security; PAMELA BONDI, in her official capacity as the Attorney General of the United States,

Respondents.

Case No. 1:25-cv-01650-KMN

**MOTION FOR TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION- ON NOTICE**

Petitioner Segundo Eloy Guaman Guasco respectfully requests, in accordance with Local Rule 5.1, 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, his detention by Respondents is unlawful. Petitioner therefore requests an order enjoining Respondents from further detaining him.

Compliance With Federal Rule of Civil Procedure Rule 65

Petitioner's Counsel complied with Federal Rule of Civil Procedure 65(b)(1). Undersigned counsel contacted the United States Attorney's Office for the Middle District of Pennsylvania on their position on this Motion on November 17, 2025 and they intend to oppose this action.

Dated: New York, NY
November 21, 2025

Respectfully submitted,

By: /s/ Paul Grotas
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Awaiting pro hac vice admission

By: /s/ Matthew J. Archambeault
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COUNSELS FOR PETITIONER