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Counsel for Petitioner Ismael Sanchez Roman

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA (Las Vegas)**

ISMAEL SANCHEZ ROMAN

Petitioner,

v.

Case No.: 2:25-cv-1684

Agency No: A

KRISTI NOEM,

in her official capacity as
Secretary, U.S. Department of
Homeland Security; 245 Murray Lane
SW, Washington, DC 20528;

**U.S. DEPARTMENT OF HOMELAND
SECURITY**

PAMELA J. BONDI,

in her official capacity as
Attorney General of the United States,
950 Pennsylvania Avenue, NW,
Washington, DC, 20530;

TODD LYONS,

in his official capacity as Acting
Director and Senior Official
Performing the Duties of the Director

for U.S. Immigration and Customs
Enforcement, 500 12th Street, SW,
Washington, DC 20536;

JASON KNIGHT,

in his official capacity as Acting Field
Office Director, Salt Lake City Field
Office Director, U.S. Immigration &
Customs Enforcement, 2975 Decker
Lake Drive Suite 100, West Valley
City, UT 84119-6096

**U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT**

JOHN MATTOS,

in his official capacity as Warden,
Nevada Southern Detention Facility,
2190 E. Mesquite Ave.
Pahrump, NV 89060

Respondents.

APPLICATION FOR A TEMPORARY RESTRAINING ORDER

Ismael Sanchez Roman ("Petitioner" or "Mr. Sanchez Roman") is presently detained by U.S. Immigration and Customs Enforcement ("ICE"). Pursuant to Rule 65 of the Federal Rules of Civil Procedure and the All Writs Act, Petitioner hereby applies for a temporary restraining order or preliminary injunction requiring that Respondents grant Petitioner a custody redetermination hearing on the merits.

As set forth in the accompanying Memorandum of Law, Respondents are detaining Petitioner in violation of the Immigration and Nationality Act. In the absence of a temporary restraining order or preliminary injunction, Petitioner will suffer irreparable injury through continued illegal detention.

1 DATED this 8th day of September, 2025.

2 Respectfully Submitted,

3
4 /s/Michael Kagan
5 Michael Kagan
6 Nevada Bar. No. 12318C

7 /s/Tia Zghaib
8 Tia Zghaib
9 Student Attorney Practicing
10 Under Nevada Supreme Court Rule 49.3

11 /s/Raymond Wu
12 Raymond Wu
13 Student Attorney Practicing
14 Under Nevada Supreme Court Rule 49.3

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