


UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JUAN CARLOS SANCHEZ ALVAREZ)	
(A ))	
)	
Petitioner,)	
)	
v.)	Case No. 1:25-cv-01090-JMB-RSK
)	
KRISTI NOEM, Secretary, U.S. Department of)	
Homeland Security; ROBERT LYNCH, Field)	
Office Director, Detroit Field Office, Immigration)	
and Customs Enforcement,)	
)	
Respondents.)	

MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION

Petitioner, by and through counsel, files for a Temporary Restraining Order to be followed by a preliminary injunction pursuant to Rule 65 of the Federal Rules of Civil Procedure. In support thereof state as follows:

1. As Petitioner notes in his Petition for Writ of Habeas Corpus and Emergency Injunctive Relief (Dkt. 1), which is hereby incorporated by reference, Plaintiff is currently detained unlawfully in ICE custody during his pending removal proceedings, in violation of his constitutional and statutory rights.

2. The actions of the Respondents violate both the Due Process Clauses of the 5th Amendment to the United States Constitution and the Immigration and Nationality Act.

3. Petitioner is being caused irreparable harm for which there is no adequate remedy at law.

4. The harm that Petitioner is being caused and is facing in the future far outweigh any harm that a temporary restraining order will cause the Defendants.

5. The public interest will be served by the issuance of a temporary restraining order.

6. In addition to his Petition for Writ of Habeas Corpus and Emergency Injunctive Relief, Petitioner also submits his memorandum of law, which is also incorporated by reference.

WHEREFORE, Petitioner requests that this Court enter a temporary restraining order that Defendants release Petitioner pursuant to the bond order issued by the Immigration Judge, and after a briefing and hearing enter a preliminary injunction continuing the temporary restraining order, and for all other proper relief.

Dated: September 26, 2025

Respectfully Submitted,
Juan Carlos Sanchez Alvarez

By: s/ Lauren McClure
One of his attorneys

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