

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

LUIS ANTONIO FALCON TENELEMA,

Case No. 25-cv-902-MAV

Petitioner,

v.

JOSEPH E. FREDEN, in his official capacity as
ICE Deputy Field Office Director, et al.

Respondents.

**PETITIONER'S NOTICE OF MOTION FOR A TEMPORARY RESTRAINING
ORDER WITH NOTICE**

MOVING PARTY: Petitioner Luis Antonio Falcon Tenelema

PLACE: The Honorable Meredith A. Vacca
United States District Judge
Kenneth B. Keating Federal Building
100 State Street
Rochester, NY 14614

RELIEF SOUGHT: Pursuant to Local Rule of Civil Procedure 65,
Petitioner respectfully moves the Court for a temporary
restraining order pending adjudication of his Petition for a
Writ of Habeas Corpus and Complaint for Injunctive
Relief.

RETURN DATE: As soon as possible, as ordered by the court.

PAPERS SUBMITTED: Memorandum of Law

Respectfully submitted,

DATED: November 26, 2025 */s/ Todd C. Pomerleau*
Boston, Massachusetts *Counsel for Petitioner*

TO: Adam Khalil, Assistant United States Attorney
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