



also denied Petitioner his statutory right to a bond hearing under the Immigration and Nationality Act (INA) and its regulations.

2. As set forth in the Memorandum of Law in support of this motion, Petitioner has satisfied the four-part test for the issuance of a TRO. Petitioner is likely to succeed on the merits of his claim that his detention without any individualized determination as to whether he constitutes a danger to the community or a flight risk violates Petitioner's due process rights under the Fifth Amendment of the U.S. Constitution. Additionally, Petitioner will demonstrate that his right to a bond hearing under the Immigration and Nationality Act and its regulations was abridged when Respondents denied him such a hearing on October 20, 2025. Petitioner and his family will suffer irreparable harm absent injunctive relief due to the emotional and financial turmoil caused by Respondents' ongoing detention of Petitioner. Moreover, the public interest and the balancing of the equities favor granting relief here, as Respondents have no cognizable interest in detaining Petitioner in violation of his statutory and constitutional rights. IN support of these claims, Petitioner will rely on the supporting documentary evidence, Exhibits A-H.
3. Through undersigned counsel, Petitioner gave notice to Assistant U.S. Attorney Anthony St. Joseph about the filing of this motion for TRO, and sent him copies of this motion, the accompanying memorandum of law, and

proposed order by e-mail. Additionally, Mr. St. Joseph receives all documents filed in this matter through the electronic filing system (ECF) system.

4. Petitioner humbly requests that the Court immediately schedule a hearing or issue a TRO enjoining Respondents from continuing to detain Petitioner in violation of his rights under both the INA and the U.S. Constitution. Petitioner also requests that the Court enjoin Respondents from re-detaining Petitioner without first providing a pre-deprivation hearing.

WHEREFORE, Petitioner respectfully request that the Court enter a temporary restraining order to enjoin Respondents from continuing to detain Petitioner.

Dated: October 28, 2025

Respectfully submitted,

/s/ Christopher P. Setz-Kelly

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**Exhibit List**

- A. Declaration of Petitioner, Alexey Kashranov
- B. Order of Release on Recognizance, dated Dec. 5, 2023
- C. Letter confirming Petitioner's employment at Mark Residential
- D. Letter confirming Petitioner's enrollment at Cooper Union
- E. Declaration of Petitioner's wife, Nogan Kashranova
- F. Administrative arrest warrant, dated Sept. 24, 2025
- G. Order of the Immigration Judge denying Petitioner a bond hearing
- H. Letters of support from community members