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5 UNITED STATES DISTRICT COURT
6 DISTRICT COURT OF NEW JERSEY

7 Giovanni Fernando MUGLIZA CASTILLO,
8
9 Petitioner,

10 v.

11 Todd LYONS, Acting Director,
Immigration and Customs Enforcement; John
TSOUKARIS, Field Office Director of
Enforcement and Removal Operations, Newark
Field Office, Immigration and Customs
12 Enforcement; Kristi NOEM, Secretary, U.S.
Department of Homeland Security; U.S.
13 DEPARTMENT OF HOMELAND
SECURITY; Pamela BONDI, U.S. Attorney
14 General; EXECUTIVE OFFICE FOR
IMMIGRATION REVIEW; Luis SOTO,
15 Director, Delaney Hall Detention Facility,

16 Respondents.
17

Case No.

**PETITIONER'S EX PARTE
APPLICATION FOR
TEMPORARY RESTRAINING
ORDER AND ORDER TO SHOW
CAUSE**

PETITIONER'S DHS NUMBER:



1 Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure, Petitioner hereby
2 moves the Court for emergency relief in the form of a temporary restraining order directing
3 Respondents to release Petitioner from his custody or to provide Petitioner with individualized
4 bond hearings before an immigration judge pursuant to 8 U.S.C. § 1226(a) within seven days of
5 issuance of an Order.

6 Petitioner also seeks a temporary restraining order enjoining the Respondents from
7 relocating Petitioner outside of the District of New Jersey pending final resolution of this case.

8 Petitioner further moves for the issuance of an order to show cause as to why a
9 preliminary injunction should not issue.

10 This application is supported by the Memorandum of Points and Authorities,
11 accompanying exhibits, as well as any additional submissions that may be considered by the
12 Court.

13 Undersigned counsel has contacted Assistant U.S. Attorney Alex D. Silagi
14 (alex.silagi@usdoj.gov) and Supervisory Assistant U.S. Attorney John Basiak
15 (john.basiak@usdoj.gov) to ascertain Respondents' position regarding the TRO and is awaiting
16 their reply.

17 DATED this 3rd of October, 2025.

/s/ Mei F. Chen
Attorney for Petitioner

1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that on October 3, 2025, I served a copy of this PETITIONERS'
3 EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND ORDER TO
4 SHOW CAUSE by mail to the following individuals:

5 Kristi Noem
6 U.S. Department of Homeland Security
7 2801 Nebraska Avenue NW
8 Washington, D.C. 20528

9 John Tsoukaris
10 Enforcement and Removal Operations
11 Newark Field Office
12 970 Broad St. 11th Floor
13 Newark, NJ 07102

14 Yolanda Pittman
15 Elizabeth Detention Center
16 25 Evans Street
17 Elizabeth, NJ 07201

18 Pamela Bondi
19 950 Pennsylvania Avenue, NW
20 Washington, DC 20530-0001

21 U.S. Attorney's Office
22 970 Broad Street, 7th Floor
23 Newark, NJ 07102

24 Civil Process Clerk
U.S. Attorney's Office
970 Broad Street, Suite 700
Newark, NJ 07102

25 A copy of this PETITIONERS' EX PARTE APPLICATION FOR TEMPORARY
26 RESTRAINING ORDER AND ORDER TO SHOW CAUSE, with all related filings was sent by
27 electronic mail to Assistant U.S. Attorney Alex D. Silagi at alex.silagi@usdoj.gov and
28 Supervisory Assistant United States Attorney John Basiak at john.basiak@usdoj.gov.

/s/ Mei F. Chen
Mei F. Chen
Counsel for Petitioner

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