

United States District Court
Western District of Oklahoma

FILED

OCT 17 2025

McLEAN, LENLOY,
Petitioner,

JOAN KANE, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY KB DEPUTY

V.

Pamela Bondi, Kristin Noem,
Scarlet Giant
Respondent.

CASE # 25-CV-1165

MOTION FOR TEMPORARY RESTRAINING
ORDER AND PRELIMINARY INJUNCTION
Under FRCP 65(a)(5)

Petitioner McLEAN LENLOY, has filed a petition seeking a writ of Habeas Corpus under 28 USC § 2241. Within such, McLEAN had requested a Temporary Restraining Order (TRO) and now moves to addendum such for the following reasons:

McLEAN duly sworn and said that on October 9th, 2025 @ approx. 8:45am McLEAN approach counsel HENRY with inquiries about the mobile law library computer and he became irate towards McLEAN with sarcasms about if "you think that you are special?" - such resulted into a grievance filed against him.

On the 12th of October 2025 @ approx 9:45am, the Chief of Security, Mr. Applewhite entered McLEAN's housing unit and walked to the middle of the unit directly in front of McLEAN's cell and made an announcement about "your beds should be made before exiting your cells" - before going straight to McLEAN's cell. See Exhibit A

He, then asked "who is in cell 122?" McLean acknowledged Applewhite. He had McLean's cell door opened and asked "Did you file a grievance?" Searching his pocket as if looking for such, then stated "I will bring it back." Then he became very hostile "why your bed not made?" McLean tried to explain, that he was cleaning and waiting for the officer to unlock the door for the cleaning supplies--while assuring him (Applewhite) that his bed is always made and staff will confirmed such. He gave McLean a direct order to make his bed, McLean comply without incident, Applewhite then said before slamming McLean's cell door almost hitting McLean "tell that to the judge". He then approached the detainee McLean was speaking with, been bookish before he exited the unit. McLean had requested through his grievance and ICE request on the tablet to preserved the CCTV camera footage for the court to review. McLean further sayth not under the penalty of perjury that the foregoing is true.

DATE: 10-12-2025

Signature:

Ly M. F.
Lincoln McLean

II
The Defendant (Scarlet Grant) is
Abidged to Petitioner's Constitutional
Rights to Due Process

It's a pattern for Warden Grant to have individuals of her administration to intimidate, frustrate, abuse their authority and retaliate against McLean for redress of his grievance complaints. McLean was housed in Federal Bureau of Prisons, Seagoville FC I in the cage and custody of Scarlet Grant as the warden prior to been apprehended by ICE on April 17th, 2024--where he had recieved the same treatment for grievance filed and petition within the courts.

Defendant (Grant) is now for undermining the fact that "Administrative rules are designed to afford due process and to 'safeguards against essentially unfair procedures'" within public interest. See *Wixon*, 326 U.S. c 152-53 (1945)

Congress has established that McLean have a right to file grievances and petition within the courts without any retribution behind such - Appokwhite's action/inaction serves only one purpose as an agent for the defendant Grant and such was to intimidate and retaliated for McLean's petition within the court and for exposing the ongoing violations within Cimarron Coll. Fac. See 18 USC § 1792

Here, the Petitioner is being punished simply for exercising his constitutional rights - he has strong probability that will succeed on the merits of his petition before the court; the threat of irreparable harm exist, because the defendant Grant and her administration has first hand knowledge of ORDER issued by the court to carry out these acts (*Id*) before Petitioner learn of such; there is a balance between harms to the Petitioner and potential injury not only on him, but other detainees/litigants that petition court and file grievances - reason this court should grant the injunction; and such TRO is in the public interest as well. See *Winter v Nat. Res. Def. Council, Inc.* 535 U.S. 7, 20 (2008). Without a TRO, the defendant (Grant) and her entourage will continue to act like ruthless cowboys without no regards.

Date: 10-13-2025

Respectfully Submitted


Lankay McLean 

Certificate of Service

I, Lenoy McLean duly sworn and said that a handwritten copy of this TRO/PI under FRCP 65(a) & (b) was served upon the locate AUSA office located at 210 W. Park Ave suite 400, Oklahoma City, OK 73102 on the 13th of October 2025. I further sayth not under penalty of perjury.

Signature: Lenoy McLean

Lenoy McLean
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Cushing, OK 74023