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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Keomanivone Phrommany,

Petitioner,

v.

Kristi Noem, Secretary, U.S. Department of
Homeland Security; Department of
Homeland Security; Todd M. Lyons, Acting
Director of Immigration and Customs
Enforcement; Immigration and Customs
Enforcement; John E. Cantú, Director,
Phoenix Field Office Immigration and
Customs Enforcement & Fred Figueroa,
Warden of Eloy Federal Detention Center.

Respondents.

**PETITIONER'S
EMERGENCY MOTION FOR
TEMPORARY
RESTRAINING ORDER
UNDER FRCP 65(b) AND
PRELIMINARY
INJUNCTION UNDER FRCP
65(a)**

**EXPEDITED HANDLING
REQUESTED**

**PETITIONER'S EMERGENCY MOTION FOR TEMPORARY RESTRAINING
ORDER AND PRELIMINARY INJUNCTION WITH EXPEDITED HANDLING**

Mr. Keomanivone Phrommany ("Petitioner"), pursuant to 28 U.S.C. § 2241, the Fifth Amendment of the United States Constitution, 8 U.S.C. §§ 1101 *et seq.* ("the INA"), 5 U.S.C. §§ 702 *et. seq.* (the "APA"), Rule 65(a)-(b) of the Federal Rules of Civil

Procedure, 28 U.S.C. § 1657 with reference to 28 U.S.C. Ch. 153, and 28 U.S.C. § 1651 (“All Writs Act”) moves the Court for entry of a Temporary Restraining Order and Preliminary Injunction (at such time that Respondents are able to respond) enjoining Respondents, and all persons acting on Respondents’ behalf, from (1) continuing to detain Petitioner; and (2) attempting to move Petitioner from the State of Arizona during this petition. Petitioner is concurrently filing an accompanying Memorandum of Law that sets forth the reasons this Motion must be granted. The moving party does not intend at this time to present witness testimony at an evidentiary hearing, as it is believed this matter can be disposed of most efficiently on the papers filed with the initial petition.

WHEREFORE, Petitioner prays that this Court grant her request for a temporary restraining order and preliminary injunction.

DATED: October 14, 2025

Respectfully submitted,

/s/ David Wilson

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Attorney for Petitioner