

1 Lauren Hodges, Esq.
2 Arizona State Bar No. 038791
3 Murray Osorio PLLC
4 4103 Chain Bridge Road, Suite 300
5 Fairfax, Virginia 22030
6 Telephone: 571-544-9906
7 Facsimile: 703-763-2304
8 lhodges@murrayosorio.com
9 *Counsel for Petitioner*

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

Oscar Armando Solis Quintanilla,

Petitioner,

Case No.:
CV-25-03828-PHX-MTL
(DMF)

v.

Kristi Noem *et. al.*,

Respondents.

MOTION FOR TEMPORARY RESTRAINING ORDER

Petitioner Oscar Armando Solis Quintanilla (AKA Jose Oscar Solis Quintanilla), by counsel, pursuant to Fed. R. Civ. P. 65(b), hereby requests that this Court temporarily enjoin Respondents from removing him from the continental United States while a preliminary injunction motion can be briefed and decided, for the reasons stated in the accompanying Memorandum of Law and exhibits thereto.

1 Petitioner is an indigent, detained noncitizen who lacks financial means to
2 pay a TRO or PI bond. Counsel for Respondents has not yet been assigned;
3
4 however, notice has been provided to Respondents via email on October 29, 2025.

5 *See* Exh. D attached hereto.

6
7 Respectfully submitted,

8 //s//Lauren Hodges

Date: October 29, 2025

9 Lauren Hodges, Esq.

10 Arizona Bar No. 038791

11 Counsel for Plaintiff

12 Murray Osorio PLLC

4103 Chain Bridge Road, Suite 300

Fairfax, Virginia 22030

13 Telephone: 571-544-9906

14 Facsimile: 703-763-2304

lhodges@murrayosorio.com

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Certificate of Service

I, the undersigned, hereby certify that on this date, I emailed the foregoing, with all attachments thereto, to:

Theo.Nickerson2@usdoj.gov;

Lindsey.Gilman@usdoj.gov ;

Katherine.branch@usdoj.gov.

Respectfully submitted,

Date: October 29, 2025

//s//Lauren Hodges

Lauren Hodges, Esq.
Arizona Bar No. 038791
Counsel for Plaintiff
Murray Osorio PLLC
4103 Chain Bridge Road, Suite 300
Fairfax, Virginia 22030
Telephone: 571-544-9906
Facsimile: 703-763-2304
lhodges@murrayosorio.com