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

Oscar Armando Solis Quintanilla,

Petitioner,

v.

Kristi Noem *et. al.*,

Respondents.

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

MOTION FOR PRELIMINARY INJUNCTION

Petitioner Oscar Armando Solis Quintanilla (AKA Jose Oscar Solis Quintanilla), by counsel, pursuant to Fed. R. Civ. P. 65(a), hereby requests that this Court enjoin Respondents from removing him from the continental United States unless and until an Immigration Judge concurs in the denial of his third-country fear screening, 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 Respectfully submitted,

7
8 //s//Lauren Hodges

Date: October 29, 2025

9 Lauren Hodges, Esq.
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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,

//s//Lauren Hodges

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Date: October 29, 2025