

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

TAMIR MONOROV,

Petitioner

v.

KRISTI NOEM, *et al.*

Respondents.

Hon. Jamel K. Semper, U.S.D.J.

Civil No.: 25-16732(JKS)

PETITIONERS' MOTION FOR TEMPORARY RESTRAINING ORDER

Pursuant to Fed. R. Civ. P. 65, Petitioner Tamir Monorov (“Petitioner”) respectfully moves for a temporary restraining order (“TRO”) pending adjudication of his Petition for a Writ of Habeas Corpus, and for entry of an Order to Show Cause why a preliminary injunction should not issue pending final disposition of this action. As set forth in the accompanying memorandum of law, Petitioner is likely to succeed on the merits because the requested relief is consistent with this District’s decision in *Rivas Rodriguez v. Rokosky*, Civ. No. 25-17419 (CPO) (D.N.J. Dec. 3, 2025), which ordered release. In that case, the court held that because petitioner had been paroled into the United States, detention under 8 U.S.C. § 1225(b)(1) was unlawful, and the proper custody statute was 8 U.S.C. § 1226(a). Immediate relief is necessary to prevent continuing, grave injury and further irreparable harm to Petitioner.

Date: 12/16/2025

/s/ Veronica Cardenas
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