

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MARIA REGLA SEPULVEDA-BAEZ,
Petitioner,

v.

Civil Action No. _____

ALEJANDRO MAYORKAS, Secretary,
U.S. Department of Homeland Security;
PATRICK J. LECHLEITNER, Acting Director,
U.S. Immigration and Customs Enforcement;
JOHN TSOUKARIS, Field Office Director,
ICE Enforcement and Removal Operations, Boston,
Respondents.

**EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

Petitioner, Maria Regla Sepulveda-Baez, by and through undersigned counsel, respectfully moves this Honorable Court pursuant to Fed. R. Civ. P. 65 for entry of a Temporary Restraining Order and Preliminary Injunction to:

1. Order Respondents to immediately release Petitioner on her own recognizance or upon posting a nominal bond not to exceed \$2,000.00, with reasonable conditions of supervision including participation in ICE's Intensive Supervision Appearance Program (ISAP) or Alternatives to Detention (ATD), electronic monitoring, regular ICE check-ins, maintenance of residence at 56 Salem Street, Apartment 1, Lawrence, Massachusetts, geographic restrictions, surrender of travel documents, and supervision by her U.S. citizen husband;
2. Prohibit Respondents from transferring Petitioner from Chittenden County Regional Correctional Facility to any other detention facility pending resolution of this action;
3. Prohibit Respondents from removing Petitioner from the United States pending resolution of this action; and
4. In the alternative, if immediate release is denied, order Respondents to provide Petitioner with a bond hearing before a neutral federal magistrate judge or immigration judge within seven (7) days, where the government bears the burden of proving by clear and convincing evidence that continued detention is justified and no conditions of supervision would reasonably assure her appearance.

This Motion is supported by the accompanying Memorandum of Law, the Petition for Writ of Habeas Corpus, and all exhibits filed herewith.

Dated: October 21, 2025

Respectfully submitted,

/s/ Arold Bien-Aime

Arold Bien-Aime, Esq.
Massachusetts BBO# 705135
AROLD LAW FIRM
451 Andover Street, Suite G4
North Andover, MA 01845
Tel: (888) 331-3864
Fax: (781) 333-3572
Email: a.bienaime@aroldlaw.com
Attorney for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of October 2025, a true and correct copy of the foregoing Emergency Motion for Temporary Restraining Order and Preliminary Injunction, Memorandum of Law in Support, and Petition for Writ of Habeas Corpus were served via electronic filing and email upon:

United States Attorney's Office
District of Massachusetts
1 Courthouse Way, Suite 9200
Boston, MA 02210
Email: USAMA.ECFCriminal@usdoj.gov

Office of Immigration Litigation
U.S. Department of Justice
Civil Division
P.O. Box 878
Ben Franklin Station
Washington, DC 20044
Email: OIL.immigration@usdoj.gov

/s/ Arold Bien-Aime

Arold Bien-Aime, Esq.