

UNITED STATE DISTRICT COURT  
DISTRICT OF NEW JERSEY

**RUPERTO VICENS MARQUEZ** )  
)  
**Petitioner,** )  
)  
**v.** )  
)  
**LUIS SOTO**, Director, Delaney Hall; )  
**TODD M. LYONS**, Acting/Director, )  
U.S. Immigration and Customs Enforcement )  
**KRISTI NOEM**, Secretary of the U.S. )  
Department of Homeland Security; and )  
**PAM BONDI**, Attorney General of the )  
United States, in their official capacities )  
**Respondents.** )  
\_\_\_\_\_ )

**ORDER TO SHOW CAUSE  
FOR PRELIMINARY  
INJUNCTION AND  
TEMPORARY  
RESTRAINING ORDER**

**Case No.** \_\_\_\_\_

Upon the verification of Martin W. Chow, Esq. sworn to on October 24, 2025, and the Petition for Habeas Corpus for a declaratory judgment and other relief, annexed exhibits, thereto,

**IT IS ORDERED**, that Respondents, **LUIS SOTO**, Director, Delaney Hall, **TODD M. LYONS**, Acting Director, U.S. Immigration Customs and Enforcement, **KRISTI NOEM**, Secretary of the U.S. Department of Homeland Security, **PAM BONDI**, Attorney General of the United States and their representatives, agents, transferees or assigns, appear before me and show cause at a motion term of this Court, at Room \_\_\_\_, to be held at the U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102, on the \_\_\_\_ day of \_\_\_\_\_, 2025, at \_\_\_\_ a.m., or as soon

thereafter as the parties or their counsel may be heard and show cause why an order should not be issued: (1) declaring that Respondents are in violation of Petitioner, **RUPERTO VICENS MARQUEZ**'s Due Process rights, pursuant to the Fifth Amendment to the U.S. Constitution and (2) ordering the immediate release of the Petitioner, or in the alternative, ordering the Immigration Judge presiding over the Petitioner's removal hearing, for an immediate bond hearing (3) enjoining, restraining, prohibiting, and precluding the Respondents from transferring, moving, removing, transporting, or relocating the Petitioner, **RUPERTO VICENS MARQUEZ** from this jurisdiction (4) within 3 days respond to the Petition for a Writ of Habeas Corpus and show cause why the Petitioner should not have such other and further relief as may be proper.

**IT IS FURTHER ORDERED** that, pending the hearing on the Petitioner's application for habeas corpus relief, that the Respondents their agents, transferees, or assigns are hereby temporarily restrained, enjoined, prohibited, precluded and stayed from transferring, moving, relocating, removing the Petitioner, **RUPERTO VICENS MARQUEZ**, from this jurisdiction and that this Court retains jurisdiction over this matter.

**SUFFICIENT** reason appearing therefore, let service personally of a copy of this Order together with the papers upon which it was granted, be made upon the Respondents' attorneys, the U.S. Attorney's Office, in Newark, NJ by overnight

mail, on or before \_\_\_\_\_, shall be deemed sufficient service.

**SO ORDERED:**

this \_\_\_\_ day of \_\_\_\_\_, 2025

\_\_\_\_\_  
U.S. DISTRICT COURT JUDGE

To: U.S. Attorney's Office  
970 Broad Street, Suite 700  
Newark, NJ 07102