

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

RIGO HERRERA-ESCOBAR

Petitioner

V.

Case No. 0:25-cv-62212-RS

Agency File 

PAMELA BONDI, et. al. ;

**PETITIONER'S EMERGENCY MOTION FOR TEMPORARY RESTRAINING
ORDER/PRELIMINARY INJUNCTION, MOTION FOR AN ORDER TO SHOW
CAUSE, AND TO CONSOLIDATE A PRELIMINARY INJUNCTION WITH THE
MERITS IN THE COMPLAINT UNDER RULE 65(a)(2).**

Petitioner respectfully requests that the Court grant his Emergency Motion for a Temporary Restraining Order and Preliminary Injunction. The grounds for this motion are set forth in the accompanying memorandum of law and the Verified Petition For Writ Of Habeas Corpus And Complaint For Declaratory And Injunctive Relief . [D.E. 1]. A proposed order also accompanies this motion.

Respectfully submitted,

/s/Bonnie Smerdon

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