

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

GUAMAN LLIGUICOTA,

Petitioner,

- against -

ALEXANDER CABEZAS, et al.,

Respondents.

No. 2:25-cv-17216 (JKS)

**NOTICE OF MOTION FOR TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUCTION**

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 65 and the Court's authority under the All Writs Act, Petitioners hereby move this Court to issue an order enjoining Respondents from transferring Petitioner Jose Eugenio Guaman Lliguicota out of the District of New Jersey or surrounding area or in the alternative, to the extent he has already been so transferred, to order that he be returned. In support of this motion, Petitioner respectfully submits a Memorandum of Law and Exhibits.

As detailed in the accompanying Memorandum of Law and supporting materials, as well as the petition for writ of habeas corpus filed on November 5, 2025, Mr. Guaman is a 42-year-old New Yorker who has resided in the U.S. continuously since 2004. Prior to his summary detention on November 1, 2025, he had lived in the same home in Corona, Queens for nearly 13 years. He resides with

his U.S.-citizen partner, the couple's three children, and his partner's U.S.-citizen son. The couple's children face significant medical hardship. On November 1, 2025, a group of federal officers, including agents from Immigration & Customs Enforcement ("ICE"), conducted a multi-hour raid in Corona, Queens. Mr. Guaman and his wife, a U.S. citizen, were walking home with their four children—all U.S. citizens ages 5 to 15—when immigration agents stopped the couple on the sidewalk in front of their home, asked if they were U.S. citizens, demanded identification, and then photographed them without their consent. The agents then swiftly handcuffed and detained Mr. Guaman as his wife and five-year-old daughter looked on in horror. He has remained in immigration custody, first in Manhattan and then in New Jersey at the time of the filing of his petition for writ of habeas corpus. But late on the evening of November 6, 2025, his family and counsel have learned that he faces imminent transfer elsewhere in the U.S.

Counsel for petitioner reached out to Respondents' counsel and two of her colleagues to alert them of the impending motion. Petitioner's counsel has not received a response. (Although no notice of appearance has been entered, the ECF notices have been going to Frances Bajada at the U.S. Attorney's Office at frances.bajada@usdoj.gov).

ECF-stamped copies of this filing, including the notice of motion, memorandum of law, exhibits and proposed order will be provided to Respondents' counsel via email immediately after filing.

Dated: New York, NY
November 7, 2025

/s/Kyle Barron

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* NOT ADMITTED IN THE DISTRICT
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Attorneys for Petitioner

Jose Eugenio Guaman Lliguicota

CERTIFICATE OF SERVICE

I certify that on November 7, 2025, I electronically filed the attached the foregoing Notice of Motion and accompanying Proposed Order and Memorandum of Law with the Clerk of the Court for the United States District Court for the District of New Jersey using the CM/ECF system. Service will therefore be effected by the CM/ECF system.

/s/ Kyle Barron

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