

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

LUIS JOSE ESPINAL-ROSA,

Petitioner,

Case No.: 2-25-cv-6376-GAW

v.

DAVID O'NEILL, in his official capacity as ICE Deputy Field Office Director; KRISTI NOEM, in her official capacity as Secretary of Homeland Security, and TODD M. LYONS, in his official capacity as Acting Director of Immigration and Customs Enforcement, J.L. JAMISON, in his official capacity as Warden of the Philadelphia Federal Detention Center, and PAMELA BONDI, in her official capacity as Attorney General of the United States,

Respondents.

MOTION FOR TEMPORARY RESTRAINING ORDER

PLEASE TAKE NOTICE that as soon as counsel may be heard, the undersigned will move the Court, seeking a Temporary Restraining Order ("TRO") in the form attached hereto and asking that this matter be set down for a hearing to convert those temporary restraints into a Preliminary Injunction pursuant to Fed. R. Civ. P. 65. In support of this motion, Petitioner submits the accompanying Memorandum of Law in Support of a Temporary Restraining Order and the concurrently filed Complaint.

WHEREFORE, Petitioner respectfully requests that this Court grant this Motion for a Temporary Restraining Order and issue an order (i) enjoining Respondents from moving him outside the District of New Jersey; (ii) enjoining the Respondents from ordering him removed from the United States (iii) enjoining Respondents from detaining Petitioner under 8 U.S.C. §

1225(b)(2); and (iv) ordering Petitioner's immediate release from Respondents' custody, or, in the alternative, a bond hearing within 7 days.

Respectfully Submitted,

Date: November 21st, 2025

s/Adam Solow

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