IN THE UNITED STATES DISTRCT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

MARIN BARRIOS,
Petitioner,

v.

ONEILL, *et al.*
Respondents.

Case No.: 2:25-cv-06379-JHS

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 detaining Petitioner under 8 U.S.C. § 1225(b)(2); and (ii) ordering Petitioner's immediate release from Respondents' custody.

Respectfully Submitted,

Date: November 20, 2025

s/Christopher M. Casazza
Christopher M. Casazza (PA Bar 309567)
Palladino, Isbell & Casazza, LLC
1528 Walnut St, Suite 1701
Philadelphia, PA 19102
p. (215) 576-9000
f. (215) 689-3531
chris@piclaw.com

ATTORNEY FOR PETITIONER

1

CERTIFICATE OF SERVICE

I, Christopher M. Casazza, Esq. hereby certify that on November 20, 2025, I caused a true and correct copy of the attached Motion for Temporary Restraining Order and Memorandum in Support to be served on the following person(s) at the following address(es) via the Court's CM/ECF electronic notification and service system:

U.S. Attorney's Office - Eastern District of Pennsylvania
615 Chestnut Street | Suite 1250 | Philadelphia, PA 19106

Dated: November 20, 2025

s/ Christopher M. Casazza, Esq.
Christopher M. Casazza, Esquire
Bar No. PA309567
Palladino, Isbell & Casazza, LLC
1528 Walnut St, Suite 1701
Philadelphia, PA 19102
p. (215) 576-9000
f. (215) 689-3531
chris@piclaw.com

ATTORNEY FOR PETITIONER