

Rebecca Hufstader, Esq.
LEGAL SERVICES OF NEW JERSEY
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Pro Bono Attorneys for Petitioner

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

_____)	
ALVARO OROZCO ALFONSO,)	
Petitioner,)	CASE NO: 2:25-cv-17371
)	
v.)	(Padin, J.)
)	
LUIS SOTO, et al.,)	ELECTRONICALLY FILED
Respondents.)	
_____)	Motion Day: December 15, 2025

**MOTION FOR TEMPORARY RESTRAINING ORDER OR
PRELIMINARY INJUNCTION**

PLEASE TAKE NOTICE THAT Petitioner Alvaro OROZCO ALFONSO, through undersigned counsel, will move before the Honorable Judge Evelyn Padin, United States District Court for the District of New Jersey, for a temporary restraining order (TRO) directing respondents to immediately release him from custody. Petitioner respectfully requests that the Court expedite consideration of this motion because, as discussed in the Memorandum of Law supporting this motion, his daughter Paula Sofia is suffering from terminal cancer and is in desperate need

of his care and support. In the alternative, Petitioner moves the court for release during the pendency of his Petition for Writ of Habeas Corpus (Doc. No. 1) pursuant to *Lucas v. Hadden*, 790 F.2d 365 (3d Cir. 1986).

In support of this motion, Petitioner will rely on the attached Memorandum of Law, as well as the Petition for Writ of Habeas Corpus and supporting exhibits.

PLEASE TAKE FURTHER NOTICE that a proposed order is submitted with this motion. Oral Argument on this motion is specifically requested by Petitioner. Petitioner respectfully requests that the Court schedule a hearing or status conference on this motion at its earliest convenience.

Dated: November 13, 2025
Edison, NJ

Respectfully Submitted,

/s/ Rebecca Hufstader

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is a person of such age and discretion as to be competent to serve papers, and that on November 13, 2025, she served a copy of the attached

MOTION FOR TEMPORARY RESTRAINING ORDER

and the attached exhibits and memorandum of law, by electronic service pursuant to Local Rule 5.2 to the following individuals:

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/s/ Rebecca Hufstader
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