

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

NASEER AHMED)	Case No. 25-6662-EAW
Petitioner,)	
v.)	
)	
)	
)	
)	
TODD LYONS, Acting Director U.S. Immigrations and Customs Enforcement, KRISTI NOEM, U.S. Secretary of Homeland Security, and JOSEPH FREDEN, Deputy Field Office Bufalo Federal Detention Facility. PAMELA J BONDI, Attorney General, United States))	
Respondents.)	

PETITIONER'S NOTICE OF MOTION FOR A TEMPORARY RESTRAINING ORDER

Moving Party: Petitioner-Plaintiff

Place: Hon. Chief Judge Elziabeth
United States District Judge
100 State Street
Rochester, NY 14616

Relief Sought: Pursuant to Local Rule of Civil Procedure 65(b)(2), Petitioner-Plaintiff respectfully moves the Court for temporary restraining order pending adjudication of his Petition for a Writ of Habeas Corpus.

Return Date: Absent court order, Local Rule of Civil Procedure 12(b)(2)(B) provides that any responding papers be filed within 14 days of the motion and any reply filed within 7 days of the responding

papers. Petitioner requests a return date of 2 days or alternatively an immediate administrative stay while the TRO motion is considered.

Papers Submitted in Support: Memorandum of Law

Respectfully submitted,
Counsel for Petitioner

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Dated: November 20 1, 2025