

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

SALVADOR RAYMUNDO MATEO  
FRANCISCO

*Petitioner,*

v.

TAMMY MARICH, et al.,

*Respondents.*

Case No. 1:25-cv-01194

**PETITIONER'S NOTICE OF MOTION FOR A TEMPORARY RESTRAINING ORDER**

**Moving Party:** Petitioner, Salvador Raymundo Mateo Francisco

**Place:** Hon. John L. Sinatra, Jr.  
United States District Judge  
Robert H. Jackson United States Courthouse  
2 Niagara Square  
Buffalo, New York 14202

**Relief Sought:** Petitioner respectfully moves the Court to order his immediate release from immigration detention, as there are currently no removal proceedings pending against him, rendering his detention *ultra vires*. In the alternative, Petitioner asks the Court to enjoin his transfer outside of this District pending adjudication of his Amended Petition for Writ of Habeas Corpus and Complaint for Injunctive and Declaratory Relief, or to at least require Respondents to provide Petitioner's counsel 72 business-hours' notice of any proposed transfer.

**Papers Submitted in Support:** Memorandum of Law

**Intent to Reply:** Pursuant to Local Rule of Civil Procedure 7(a)(1), Petitioner respectfully requests the opportunity to respond to any response filed by Respondents to the instant motions.

DATED: November 19, 2025  
New York, New York

Respectfully Submitted,

/s/ Sarah T. Gillman

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\**Pro hac vice* application forthcoming

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