

Onal Gallant Bayram & Amin

Enes Hajdarpasic, Esq.
(NJ Bar No. 028542011)
619 River Dr., Suite 340
Elmwood Park, NJ 07407
P: (201) 508-0808
enes@ogplawfirm.com
Attorney for Petitioner

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

RONALD ERNESTO VASQUEZ-
COLOCHO,

Petitioner,

v.

LUIS SOTO, Warden of Delaney Hall;
TODD LYONS, Acting Director of
Immigration and Customs Enforcement;
KRISTI NOEM, Secretary of the U.S.
Department of Homeland Security;
PAMELA BONDI, Attorney General of the
United States.

Respondents.

Docket No. 3:25-CV-17601

**NOTICE OF MOTION
FOR TEMPORARY
RESTRAINING ORDER
AND PRELIMINARY
INJUNCTION**

PLEASE TAKE NOTICE that, as soon as thereafter as counsel may be heard, the law firm of Onal Gallant Bayram & Amin moves for a temporary restraining order and preliminary injunction pursuant to Federal Rule of Civil Procedure 65; and

PLEASE TAKE FURTHER NOTICE that, counsel shall rely on the accompanying Declaration of Enes Hajdarpasic, Esq., accompanying exhibits, and memorandum of law, in support of this motion; and

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is also submitted

herewith.

PLEASE TAKE FURTHER NOTICE that a courtesy copy of this filing was emailed to the U.S. Attorney's Office after it was filed electronically.

Date: December 2, 2025

Respectfully submitted,

ONAL GALLANT BAYRAM & AMIN
Attorneys for Petitioner

By: /s/ Enes Hajdarpasic, Esq.
ENES HAJDARPASIC, ESQ.