

1 Eric Mark
2 Law Office of Eric M. Mark
3 96 Summer Ave
4 Newark, NJ 07104
5 Tel: (973) 306-4246
6 Email: EricM@ericmarklaw.com

7 Attorney for Petitioner

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

10 **FLOR LISBETH PORTILLO**
11 **QUINTANILLA,**

12 Petitioner

13 vs.

14 **TODD LYONS**, Acting Director,
15 Immigration and Customs
16 Enforcement, **KRISTI NOEM**,
17 Secretary of United States
18 Department of Homeland Security,
19 **RUBEN PEREZ**, Immigration and
20 Customs Enforcement, Newark
21 Field Office Director, **LUIS SOTO**,
22 Director, Delaney Hall Detention
23 Facility, **PAMELA BONDI**, United
24 States Attorney General,
25

Respondents

) **CASE NO. 25-17660**
)
) **PETITIONERS' EX PARTE**
) **APPLICATION FOR**
) **TEMPORARY RESTRAINING**
) **ORDER AND ORDER TO SHOW**
) **CAUSE**

1 Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure, Petitioner hereby
2 moves the Court for emergency relief in the form of a temporary restraining order directing
3 Respondents to release Petitioner from custody with no conditions of release, such as GPS
4 monitoring, that would constitute *de facto* custody.

5 This request for an Order issued without notice is based on the immediate and irreparable
6 harm the petitioner will suffer without such an order. Respondents' position on this matter is
7 known and any attempt to provide notice or negotiate a reasonable resolution is futile. The
8 respondents' have maintained their obstinate and unlawful opposition to due process and liberty
9 in this and hundreds of other similarly situated cases.

10 This application is supported by an affidavit from counsel and exhibits including Ms.
11 Portillo's motion to continue her immigration court proceedings, the immigration court's
12 unreasonable denial of that motion, and affidavits from several attorneys addressing the absence
13 of due process in the immigration court.
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15 Respectfully submitted,

16 Dated: December 12, 2025

17 By: /s/ Eric M. Mark
18 Eric M. Mark
19 Attorney for Petitioner
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