

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

Wilson Fernando Pasato Zhishpon)	
)	
Petitioner,)	Case No.: 25-cv-06678-MAV
v.)	
)	
MICHAEL BALL)	
<i>in his official capacity</i> as Warden of Buffalo)	
Federal Detention Center;)	
)	
STEPHEN KURZDORFER, <i>in his official</i>)	
<i>capacity</i> as Field Office Director, Buffalo Field)	
Office, Enforcement and Removal Operations,)	
U.S. Immigration and Customs Enforcement.;)	
)	
TODD M. LYONS, <i>in his official capacity</i> as)	
Acting Director, Immigration and Customs)	
Enforcement,)	
)	
KRISTI NOEM, <i>in her official capacity</i> as)	
Secretary, U.S. Department of Homeland)	
Security; and)	
)	
PAMELA JO BONDI, <i>in her official capacity</i>)	
as Attorney General of the United States;)	
)	
Respondents.)	
_____)	
)	

MOTION FOR TEMPORARY RESTRAINING ORDER

PLEASE TAKE NOTICE that as soon as counsel may be heard, the undersigned will move the Court, seeking a Temporary Restraining Order (“TRO”) in the form attached hereto and asking that this matter be set down for a hearing to convert those temporary restraints into a Preliminary Injunction pursuant to Fed. R. Civ. P. 65. In support of this motion, Petitioner submits the accompanying Memorandum of Law in Support of a Temporary Restraining Order and the concurrently filed Petition for Writ of Habeas Corpus.

WHEREFORE, Petitioner respectfully requests that this Court grant this Motion for a

Temporary Restraining Order and issue an order (i) enjoining Respondents from moving him outside the Western District of New York; (ii) enjoining Respondents from detaining Petitioner under 8 U.S.C. § 1225(b)(2); and (iii) ordering Petitioner's immediate release from Respondents' custody.

Respectfully Submitted,

Date: November 20, 2025

/s/Jonathan Langer
Jonathan Langer (NY 5572359)
Law Office of Jonathan Langer, PLLC
260 Madison Ave, 17th Floor
New York, NY 10016
Phone: 646.801.9332
Email: jonathan@jonathanlangerlaw.com

Celina B. Curillo, Esq.* (CT 446131)
The Law Office of Celina B. Curillo
64 North Street, 2nd Floor
Danbury, CT 06810
Phone: (203) 892-4060
Email: celina@cbclaw.net

**Motion for Pro Hac Vice forthcoming*

Attorneys for Petitioner