

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA**

HENRIQUEZ HERNANDEZ,  
Petitioner,

v.

ROSE, *et al.*  
Respondents.

Case No.: 1:25-cv-02221-DFB

**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 Complaint.

WHEREFORE, Petitioner respectfully requests that this Court grant this Motion for a Temporary Restraining Order and issue an order (i) enjoining Respondents from detaining Petitioner under 8 U.S.C. § 1225(b)(2); and (ii) ordering Petitioner’s immediate release from Respondents’ custody.

Respectfully Submitted,

Date: November 21, 2025

*s/Alex G. Isbell, Esq.*  
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ATTORNEY FOR PETITIONER

**CERTIFICATE OF SERVICE**

I, Alex G. Isbell, Esq. hereby certify that on November 21, 2025, I caused a true and correct copy of the attached Motion for Temporary Restraining Order and Memorandum in Support to be served on U.S. Attorney's Office -Middle District of Pennsylvania – **Petitioner has sent a courtesy copy of this Motion and the underlying Petition via email and will effectuate proper Rule 4 service.** Service is also effectuated via the Court's CM/ECF electronic notification and service system:

Dated: November 21, 2025

s/ Alex G. Isbell, Esq.  
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