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**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Jaime Fernando PEREZ SUSPES, A 

Petitioner,

v.

Michael T. ROSE, et al.,

Respondents.

Case No. 2:25-cv-06608-AB

**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 moving him outside the Eastern District of Pennsylvania; (ii) enjoining Respondents from detaining Petitioner under 8 U.S.C. § 1225(b)(2); and (iii) ordering Petitioner’s immediate release from Respondents’ custody.

DATED: November 24, 2025

Respectfully submitted,

/s/ Karen L. Hoffmann, Esq.

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ATTORNEYS FOR PETITIONER

**CERTIFICATE OF SERVICE**

I hereby certify that on this 24th day of November, 2025, the foregoing Motion and accompanying documents were filed electronically with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all registered participants.

/s/ Karen L. Hoffmann, Esq.