

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

ARMANDO DAVID CRUZ LOPEZ,

Petitioner-Plaintiff,

v.

RANDI BORGEN, in his official capacity as
Field Office Director, Newark Field Office,
U.S. Immigration & Customs Enforcement;

KRISTI LYNN NOEM, in her official capacity
as Secretary, U.S. Department of Homeland
Security;

PAMELA JO BONDI, in her official capacity
as Attorney General, U.S. Department of
Justice; and

ERIC RAKOSKY, in his official capacity as
Warden, Elizabeth Contract Detention Facility.

Respondents-Defendants.

Civil Action No. 25-17850

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

Petitioner Armando David Cruz Lopez, respectfully requests that the Court grant his Emergency Motion for a Temporary Restraining Order and Preliminary Injunction. The grounds for this motion are set forth in the accompanying memorandum of law, exhibits in support thereof, complaint, and the applicable law. A proposed order also accompanies this motion.

Dated: New York, New York
November 26, 2025

Respectfully Submitted,

By: /s/ Jessica Greer Griffith

Jessica Greer Griffith

Bar No. 126432014

Toni Ann Kruse

McDermott Will & Schulte

1 Vanderbilt Avenue

New York, New York 10017

Telephone: (212) 547-5400

Facsimile: (212) 547-5444

ggriffith@mwe.com

tkruse@mwe.com

Attorney for Petitioner