

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

YOHANDRY JOSE CASTRO CONEO,,

*Petitioner,*

-v-

PAUL ARTETA, *et al.*,

*Respondents.*

**Case No. 7:25-cv-09850-NSR**

**MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY  
INJUNCTION**

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 Southern 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: December 6, 2025  
New York, NY

/s/Jonathan Langer  
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