

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

CRISTOFER A. ORTEGA-VARELA,

Petitioner,

v.

CHRIS BRACKETT, in his official
capacity As Superintendent, Strafford
County Department of Corrections;

PATRICIA HYDE, in her official capacity
as Acting Field Office Director of the
Boston Field Office of U.S. Immigration
and Customs Enforcement, Enforcement
and Removal Operations;

TODD LYONS, in his official capacity as
Acting Director and Senior Official
Performing the Duties of the Director of
U.S. Immigration and Customs
Enforcement;

KRISTI NOEM, in her official capacity as
Secretary of the Department of Homeland
Security,

Respondents.

Case No. 1:25-cv-483-PB-TSM

Judge Paul J. Barbadoro

**PETITIONER'S EMERGENCY MOTION FOR
TEMPORARY RESTRAINING ORDER**

Petitioner Cristofer A. Ortega-Varela respectfully requests that the Court grant his Emergency Motion for a Temporary Restraining Order enjoining Respondents from removing him from the United States. The grounds for this motion are set forth in the accompanying memorandum of law. A proposed order also accompanies this motion.

Dated: February 13, 2026

Respectfully submitted,

/s/ Jessica Charniga

JESSICA CHARNIGA, ESQ.*

NJ Bar ID 012902011

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Attorneys for Petitioner

**Appearing pro hac vice*

CERTIFICATE OF SERVICE

I, Jessica Charniga, hereby certify that a true and correct copy of the foregoing was served this date via the Court's CM/ ECF system upon all parties and counsel of record.

Dated: 02/13/2026

By: /s/ Jessica Charniga
JESSICA CHARNIGA, ESQ.