

**UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION**

MARIO ERNESTO MANZANARES HERNANDEZ,
Petitioner,

v.

KRISTI NOEM, et al.
Respondents.

Civil Action No. 25-CV-243 (JAK)(BCB)

**EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER
AND ORDER TO SHOW CAUSE
WHY A PRELIMINARY INJUNCTION SHOULD NOT ISSUE**

Petitioner Mario Ernesto Manzanares Hernandez, by and through undersigned counsel, respectfully moves this Court pursuant to Rule 65 of the Federal Rules of Civil Procedure for an emergency Temporary Restraining Order and an Order to Show Cause why a preliminary injunction should not be issued.

As set forth in the accompanying Memorandum in Support, verified habeas petition (ECF No. 6), Petitioner is being detained without lawful authority and faces imminent and irreparable harm absent immediate judicial intervention. Petitioner incorporates the accompanying memorandum and any exhibits as though fully set forth herein.

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

- A. Issue a Temporary Restraining Order prohibiting Respondents from removing Petitioner from the United States, or taking any action to effect his removal, while this matter is pending;
- B. Enjoin Respondents from transferring Petitioner outside the Southern District of Texas during the pendency of these proceedings;
- C. Issue an Order to Show Cause directing Respondents to show why a preliminary injunction should not enter;
- D. Order Petitioner’s immediate release under reasonable conditions of supervision;
- E. Waive any bond requirement pursuant to Rule 65(c); and
- F. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted this 2ND day of December 2025.

/s/Charlie Carrillo
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Attorneys for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2025, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record for Respondents.

/s/Charlie Carrillo
Charlie Carrillo, Esq.