

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA**

S.N.H.,

Petitioner,

v.

BRIAN ENGLISH, *in his official capacity as* Warden, Miami Correctional Facility; **SAMUEL OLSON**, *in his official capacity as* Field Office Director, Chicago Field Office, United States Immigration and Customs Enforcement; **TODD M. LYONS**, *in his official capacity as* Acting Director, United States Immigration and Customs Enforcement; **KRISTI NOEM**, *in her official capacity as* Secretary of Homeland Security; **PAMELA BONDI**, *in her official capacity as* United States Attorney General,

Respondents.

No. 3:25-cv-00993

**PETITIONER'S APPLICATION FOR ORDER TO SHOW CAUSE AND
PRELIMINARY INJUNCTION AND TEMPORARY RESTRAINING ORDER**

In light of Petitioner's prolonged immigration detention which threatens his liberty and physical and mental safety, Petitioner respectfully moves this Court for a temporary restraining order or preliminary injunction requiring Respondents to release Petitioner and enjoining them continuing to detain or seek to remove Petitioner during the pendency of this petition.

Counsel for Petitioner provided notice of Petitioner's intent to file this application to counsel for Respondents at the U.S. Attorney's Office for the Northern District of Indiana.

Dated: December 1, 2025

Respectfully submitted,

/s/ Erica Rodarte

Erica Rodarte (PA Bar No. 332762)

BROOKLYN DEFENDER SERVICES

177 Livingston Street, 7th Floor

Brooklyn, NY 11201

Tel: 718-254-0700

Email: erodarte@bds.org