UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION

Carlos Luis GONZALEZ CARMONA Petitioner, v. FIELD OFFICE DIRECTOR GARRETT J. RIPA, et al., Respondents.	Case No. 2:25-cv-01128-SPC-DNF **EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER AND/OR PRELIMINARY INJUNCTION; SUPPORTING LEGAL MEMORANDUM**

EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER AND/OR PRELIMINARY INJUNCTION

Petitioner Carlos Luis Gonzalez Carmona respectfully moves this Court for a Temporary Restraining Order (TRO) enjoining Respondents from removing him from the United States pending final resolution of his habeas corpus petition. On December 12, 2025, Assistant United States Attorney Kevin R. Huguelet informed undersigned counsel and the Court that Petitioner's third-country removal to Mexico is imminent, specifically in less than a week (Doc. 16). Then, on December 15, 2025, Mr. Huguelet informed undersigned counsel and the Court that Respondents did not agree to

voluntarily stay the removal until the merits of the habeas petition were resolved because there was "no Order in place preventing removal" (Doc. 17).

Petitioner has been continuously present in the United States for over four years, has complied with all reporting requirements imposed by Respondents, and was initially released under 8 U.S.C. § 1226 and placed into full removal proceedings under 8 U.S.C. § 1229a. Respondents' abrupt dismissal of those proceedings and subsequent arrest and detention of Petitioner under expedited removal violates the Immigration and Nationality Act (INA) and violates Petitioner's Fifth and Fourth Amendment rights. Thus, Petitioner is likely to succeed on the merits of his habeas petition.

Further, absent a TRO, Petitioner faces irreparable harm, including permanent separation from his family and imminent wrongful removal to a third country where he has no ties or legal protections. Finally, the balance of hardships and the public interest favor a TRO because Petitioner faces several severe and irreversible harms if removed from the United States and the public is better served by the faithful execution of immigration laws. Conversely, the government would suffer minimal harm by a brief pause of Petitioner's removal. For these reasons, and as detailed in the supporting memorandum, Petitioner respectfully requests that the Court grant this motion and enjoin his removal pending adjudication of his habeas petition.

LEGAL MEMORANDUM

I. LEGAL STANDARD

The standard for a TRO is the same as for a preliminary injunction. *See New Motor Vehicle Bd. of Cal. v. Orrin W. Fox Co.*, 434 U.S. 1345, 1347 n.2 (1977). A TRO is "an extraordinary remedy that may only be awarded upon a clear showing that the plaintiff is entitled to such relief." *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 24 (2008); *Siegel v. LePore*, 234 F.3d 1163, 1176 (11th Cir. 2000).

This Court has authority to issue a TRO under Federal Rule of Civil Procedure 65. *Fla. v. Mayorkas*, 672 F. Supp. 3d 1206, 1212 (N.D. Fla. 2023). To obtain a TRO, a party must demonstrate "(1) a substantial likelihood of success on the merits; (2) that irreparable injury will be suffered if the relief is not granted; (3) that the threatened injury outweighs the harm the relief would inflict on the non-movant; and (4) that the entry of the relief would serve the public interest." *Schiavo ex. rel Schindler v. Schiavo*, 403 F.3d 1223, 1225-26 (11th Cir. 2005); *Keister v. Bell*, 879 F.3d 1282, 1287-88 (11th Cir. 2018).

Notably, "[t]he third and fourth factors merge when a party seeks an injunction against the government." *HM Fla.- ORL, LLC v. Gov. of Fla.*, 137 F.4th 1207, 1224 (11th Cir. 2025); *Nken v. Holder*, 556 U.S. 418, 435 (2009). Preliminary injunctive relief such as a TRO "is an extraordinary and drastic remedy not to be granted unless the movant 'clearly carries the burden of

persuasion' as to the four prerequisites." *United States v. Jefferson Cnty.*, 720 F.2d 1511, 1519 (11th Cir. 1983); *Wreal, LLC v. Amazon.com, Inc.*, 840 F.3d 1244, 1247 (11th Cir. 2016).

II. STATEMENT OF FACTS

Petitioner Carlos Luis Gonzalez Carmona entered the United States on or about October 3, 2021, and was apprehended and detained by Respondents. On or about October 4, 2021, Respondents initiated removal proceedings against Petitioner under 8 U.S.C. § 1229a in Miami, Florida. Respondents issued him a Notice to Appear (NTA) without a hearing date or time that alleged that Petitioner was inadmissible to the United States under 8 U.S.C. § 1182(a)(6)(A)(i).

On or about October 13, 2021, based on the individualized facts of Petitioner's case, Respondents released Petitioner from its custody on an Order of Release on Recognizance pursuant to 8 U.S.C. § 1226(a). Respondents enrolled Petitioner in an Alternatives to Detention (ADT) Program and Petitioner complied with all reporting and release conditions.

Given that the Department of Homeland Security (DHS) had not yet filed Petitioner's NTA with the immigration court, Petitioner timely filed Form I-589, Application for Asylum and for Withholding of Removal with USCIS on February 7, 2022, and attended his biometrics appointment on April 22, 2022. Petitioner then applied for and received employment authorization based on

his pending asylum application. After receiving employment authorization, Petitioner worked at the company Formcrete as a concrete pumper for almost three years. Petitioner also has a strong support network of U.S. citizen family and friends in Miami, Florida. On information and belief, Petitioner has no criminal history.

On April 20, 2025, DHS re-issued Petitioner an NTA, ordering that he appear for a hearing in Miami Immigration Court on November 4, 2025. Petitioner appeared for his scheduled immigration court hearing on November 4, 2025. However, instead of allowing Petitioner to proceed with his asylum case, Respondents moved to dismiss Petitioner's case entirely and the immigration court dismissed the proceedings.

On information and belief, Respondents did not advise Petitioner that they sought to terminate the case to then place Petitioner in expedited removal proceedings. After exiting the courtroom, U.S. Immigration and Customs Enforcement (ICE) agents immediately arrested Petitioner. They did not offer Petitioner any process, including any opportunity to be heard. On November 4, 2025, the same day as his courthouse arrest, ICE issued Petitioner a Notice and Order of Expedited Removal.

Petitioner was first detained at Alligator Alcatraz, now named Florida Soft Side South, in Ochopee, Florida. Within two weeks, he was transferred

away from the Southern District of Florida to Glades County Detention Center in Moore Haven, Florida, where he is currently detained.

On December 3, 2025, almost a month after his arrest and detention, DHS agents visited Petitioner and informed him that ICE intends to deport him to Mexico, a third country. On December 4, 2025, Petitioner, through undersigned counsel, filed a writ of habeas corpus, challenging the legality of his expedited removal order and detention. On December 5, 2025, the Honorable Judge Sheri Polster Chappell filed an Order to Respondents to respond and show cause why the petition should not be granted.

On December 11, 2025, Respondents filed their response to the petition. The following day, on December 12, 2025, Mr. Huguelet contacted undersigned counsel to inform her that "ICE's current understanding is that third-country removal to Mexico will likely occur in roughly a week or so." *See* Ex. Notice of Imminent Removal by Email. Mr. Huguelet then filed a Notice of Upcoming Removal with this same information (Doc. 16). On December 15, 2025, Mr. Huguelet notified undersigned counsel and the Court that Respondents will not voluntarily stay removal until the merits of the habeas petition are resolved. (Doc. 17).

III. NOTICE TO OPPOSING PARTY

On Monday, December 15, 2025, Petitioner's undersigned counsel provided notice to the United States Attorney's Office that this Emergency

Motion for Temporary Restraining Order and/or Preliminary Injunction would be filed. *See* Ex. TRO Notice by Email; *See* Ex. Declaration in Support of Emergency Motion for Temporary Restraining Order and/or Preliminary Injunction. In advance of filing, Petitioner's undersigned counsel provided government counsel with a copy of this motion. *Id.*

IV. ARGUMENT

A. Petitioner is Likely to Succeed on the Merits

1. Petitioner is likely to succeed on the merits of his claim that his re-detention under expedited removal violates the INA and its implementing regulations.

The INA provides for mandatory detention of certain categories of noncitizens "seeking entry into the United States" under 8 U.S.C. § 1225(b). *Jennings*, 583 U.S. at 297; *see* § 1225(b) ("Inspection of applicants for admission"). In *Jennings*, the Supreme Court recently confirmed that this mandatory scheme applies "at the Nation's borders and ports of entry, where the Government must determine whether a[] [noncitizen] seeking to enter the country is inadmissible." *Jennings*, 583 U.S. at 287.

Section 1225 is split into two categories. Section 1225(b)(1) (A)(i) provides for mandatory detention of noncitizens charged with enumerated grounds of inadmissibility *and* placed in expedited removal proceedings. Because there are so few procedural protections, expedited removal applies narrowly to those noncitizens who have not "been physically present in the

United States continuously for the 2-year period immediately prior to the date" they were determined inadmissible under 8 U.S.C. § 1182(a)(6)(C) or § 1182(a)(7). No other person may be subjected to expedited removal. 8 C.F.R. § 235.3(b)(1), (b)(3). Meanwhile, Section 1225(b)(2) applies only to recently arrived noncitizens seeking entry at a border or port of entry.

For decades, Respondents consistently considered noncitizens present in the United States without having been admitted or paroled as detained under 8 U.S.C. § 1226(a), thus entitling them to bond hearings. *See, e.g.*, Inspection and Expedited Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal Proceedings; Asylum Procedures, 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997). However, this year, Respondents have taken various steps to expand their use of expedited removal and mandatory detention.

On January 20, 2025, President Trump ordered DHS to apply expedited removal to its full statutory extent, which DHS did four days later. *See* Exec. Order No. 14,159, *Protecting the American People Against Invasion*, 90 Fed. Reg. 8443 (Jan. 20, 2025); Dep't of Homeland Sec., *Designating Aliens for Expedited Removal,* 90 Fed. Reg. 8139 (Jan. 24, 2025). Therefore, with limited exceptions, DHS now applies expedited removal to individuals in the United States who have been in the country for less than two years and who were determined to be inadmissible under 8 U.S.C. § 1182(a)(6)(C) or (a)(7).

Even with Respondents' expansion of expedited removal to its full statutory extent, Petitioner cannot be detained under 8 U.S.C. § 1225(b)(1). *See Ernesto Alfonso Perez v. Matthew Mordant et al.*, No. 2:25-CV-00947-SPC-DNF, 2025 WL 3466956, at *5 (M.D. Fla. Dec. 3, 2025) ("...the decision to designate Alfonso Perez for expedited removal violates the INA because noncitizens who have been paroled into the country are not eligible for expedited removal."). First, Petitioner has been physically present in the United States for more than two years before his current detention. Specifically, Petitioner entered the United States in October 2021 and has not left since. Second, Petitioner was not found to be inadmissible under 8 U.S.C. § 1182(a)(6)(C) or § 1182(a)(7) when he first entered or any time before his first two years of physical presence in the United States. Petitioner was only found to be removable because he entered without inspection, 8 U.S.C. § 1182(a)(6)(A)(i). This is further corroborated by the NTA issued to Petitioner which includes a single charge of inadmissibility under Section 1182(a)(6)(A)(i). Thus, Respondents cannot contend that Section 1225(b)(1)(A) applied to Petitioner when they did not even rely on a ground of inadmissibility that renders that subsection applicable.

Additionally, Petitioner's initial apprehension in 2021 was not under Section 1225(b)(1). Petitioner's "Order of Release on Recognizance," dated October 13, 2021, states that he has been "placed in removal proceedings" and,

in accordance with Section 1226, is being released on his own recognizance. Respondents cannot retroactively transform what was clearly action taken under Section 1226 into detention under Section 1225(b)(1).

2. *Petitioner is likely to succeed on the merits of his claim that his re-detention under expedited removal violates his Fifth Amendment right to due process.*

Noncitizens are entitled to due process protections under the Fifth Amendment, regardless of their immigration status. *Demore v. Kim*, 538 U.S. 510, 523 (2003) (quoting *Reno v. Flores*, 507 U.S. 292, 306 (1993); *Zadvydas*, 533 U.S. at 693. To determine whether civil detention violates a noncitizen's Fifth Amendment procedural due process rights, courts apply the three-part test in *Mathews v. Eldridge*, 424 U.S. 319 (1976). Under *Mathews*, courts weigh the following three factors: 1) "the private interest that will be affected by the official action;" 2) "the risk of an erroneous deprivation of such interest through the procedures used, and the probable value, if any, of additional or substitute procedural safeguards;" and 3) "the Government's interest, including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail." *Id.* at 335.

Detention, even civil immigration confinement, infringes on a fundamental protected liberty interest. *Hamdi v. Rumsfeld*, 542 U.S. 507, 529, 531 (2004). Petitioner is currently detained in conditions that are

indistinguishable from criminal incarceration. His detention deprives him of privacy, freedom of movement, and the ability to work and see his loved ones.

Second, Respondents' current procedures create a substantial risk of erroneous deprivation of Petitioner's liberty interest in remaining free from detention. When Respondents detained Petitioner in 2021, they found that he was not a threat to national security and released him pending his immigration hearing. Since then, Petitioner's criminal history has remained clean, and he has proved he is not a flight risk by attending his immigration court hearings.

Still, on August 14, 2025, Respondents arrested Petitioner at the courthouse without any new or additional information suggesting he is a threat to public safety or a flight risk. Even more, Respondents exceeded its statutory authority when they designated Petitioner for expedited removal after being physically present in the United States for more than two years prior to any "determination of inadmissibility" under Section 1225(b)(1).

Once placed in expedited removal, a low-level DHS officer can order the removal of an individual who has been living in the United States with virtually no administrative process—just completion of cursory paperwork. The procedure used by Respondents did not give Petitioner an opportunity to challenge the legal basis for his detention or its necessity. *See Make the Road New York v. Noem*, --- F. Supp. 3d ---, ---, 2025 WL 2494908, at *17 (D.D.C. 2025) ("In short, the expedited removal process hardly affords 12 individuals

any opportunity, let alone a 'meaningful' one, to demonstrate that they have been present in the United States for two years.").

Additionally, there are reasonable alternatives available for Respondent to pursue. As discussed above, Section 1226(a) applies to noncitizens facing charges of inadmissibility, including noncitizens, like Petitioner, who entered without inspection and were later detained while residing inside the country. As such, proper application of the INA's detention scheme allows for the possibility of detaining Petitioner under Section 1226(a) but first requires a bond hearing to make an individualized determination of his risk of flight or dangerousness. Such a hearing has not happened. Without it, the risk of erroneous deprivation of Petitioner's freedom is high.

Third, the government's interest in maintaining the current procedure is minimal. Any government interest in public safety or ensuring that Petitioner attends future immigration proceedings would be satisfied through proper application of Section 1226(a), which requires a bond hearing where an immigration judge will consider Petitioner's individualized facts to determine whether he is a danger to the community or a flight risk. Importantly, in Petitioner's case, Respondents already released him in November 2021 based on the individualized facts of his case and nothing has changed that would provoke re-detention. *See Ernesto Alfonso Perez v. Matthew Mordant et al.*, No. 2:25-CV-00947-SPC-DNF, 2025 WL 3466956, at *5 (M.D. Fla. Dec. 3, 2025)

("the Court finds that ICE violated [the noncitizen's] right to due process by revoking his parole, designating him for expedited removal, and detaining him without reasonable notice and a meaningful opportunity to be heard").

Finally, civil immigration detention violates substantive due process if it is not reasonably related to its statutory purpose. *Jackson v. Indiana*, 406 U.S. 715, 738 (1972); *Brown v. Taylor*, 911 F.3d 235, 243 (5th Cir. 2018). The only legitimate purpose for civil immigration detention is to prevent flight risk and ensure the safety of the community. *Zadvydas*, 533 U.S. at 690–91. Here, Petitioner's detention is not reasonably related to its purpose. As mentioned above, there is no reason to believe that Petitioner would not attend his immigration proceedings because he attended all his previous hearings and complied with all reporting and release conditions. Further, Petitioner has no criminal history and there has been no material change regarding public safety since Petitioner's prior release from Respondent's custody in November 2021. Thus, Petitioner's detention is also unconstitutional because it does not serve a lawful purpose.

3. *Petitioner is likely to success on the merits of his claim that his re-arrest and re-detention violates his Fourth Amendment right to be free from unreasonable seizures.*

According to the Supreme Court, the Fourth Amendment's protections "against unreasonable searches and seizures" generally apply to immigration-related arrests and detentions. *U.S. v. Brignoni-Ponce*, 422 U.S. 873, 884

(1975). Searches at the border are "qualitatively different" from those occurring in the interior of the United States, because individuals entering the country have less expectations of privacy, given the government's broad power to safeguard the nation's security. *U.S. v. Montoya de Hernandez*, 473 U.S. 531, 538 (1985). Additionally, ICE had historically adopted a policy that restricted immigration enforcement actions in or near "sensitive locations," including courthouses, except in specified circumstances, such as national security threats and imminent risk of physical harm to a person. ICE, *Memorandum on Civil Immigration Enforcement Actions in or near Courthouses* (April 27, 2021), https://www.ice.gov/sites/default/files/documents/ciEnforcementActionsCourthouses2.pdf#page=2.

Petitioner was initially apprehended and detained by Respondents after entering the United States in October 2021. He was singularly charged as inadmissible to the United States for not being admitted or paroled under 8 U.S.C. § 1182(a)(6)(A)(i). The government exercised its discretion under the INA to release Petitioner while he litigated that single charge in immigration court. At the time of Petitioner's courthouse arrest on November 4, 2025, he had been living at liberty pursuant to that prior determination by Respondents. As mentioned above, the government lacked reliable information of changed or exigent circumstances that would justify Petitioner's arrest and

detention after Respondents previously decided he could pursue his claims for immigration relief at liberty.

Petitioner's sudden and calculated re-arrest outside the courtroom following the Court's dismissal of his removal proceedings is unreasonable and therefore violates the Fourth Amendment.

B. Petitioner Will Suffer Irreparable Harm Absent a Temporary Restraining Order

To satisfy the second requirement for preliminary injunctive relief, Petitioner must show he will otherwise suffer irreparable injury—that is, injury that "cannot be undone through monetary damages." *Scott v. Roberts*, 612 F.3d 1279, 1295 (11th Cir. 2010). If Petitioner is removed from the United States before this Court can adjudicate his habeas petition, he will suffer irreparable harm that cannot be remedied by monetary damages.

Here, Petitioner's imminent removal would cause several forms of irreparable harm and foreclose any recourse. First, removal would effectively moot his habeas petition and deprive this Court of jurisdiction to hear his claims. "It is well established that the deprivation of constitutional rights 'unquestionably constitutes irreparably injury." *Gayle v. Meade*, 614 F. Supp. 3d 1175, 1205 (S.D. Fla 2020 (quoting *Elrod v. Burns*, 427 U.S. 347, 373 (1976)); *see also Hernandez v. Sessions,* 872 F. 3d 976, 994 (9th Cir. 2017).

In his habeas petition, Petitioner raised specific allegations of violations of his Fifth Amendment right to due process, both substantive and procedural, and his Fourth Amendment right to be free from unreasonable searches and seizures. These allegations center on Respondents' unlawful re-detention of Petitioner at the courthouse without notice or an opportunity to be heard as to whether a change in custody status was warranted. Petitioner also alleges that he is ineligible for detention and removal under expedited removal due to the length of his presence in the United States.

Second, his removal would inflict substantial harm on Petitioner by separating him from his established life in the United States, including his family, friends, and the extensive support system he has developed over the last four years. Absent a TRO, Petitioner has no hope of being reunited with his family, friends, and community. Such permanent separation from loved ones is an important and recognized irreparable harm factor. *See Washington v. Trump*, 847 F.3d 1151, 1169 (9th Cir. 2017) (per curiam) (finding "separated families" to be a "substantial injur[y] and even irreparable harm[]"); *Tefel v. Reno*, 972 F. Supp. 608, 619-620 (S.D. Fla. 1997) (failure to issue temporary restraining order would result in irreparable injury including family separation), rev'd on other grounds 180 F.3d 1286 (11th Cir. 1999).

Third, Petitioner would be removed to Mexico, a country where he has no ties or legal status. Petitioner is a Cuban national who has never lived in

Mexico. Removing Petitioner to Mexico runs the risk of sending him to persecution and torture in violation of United States and international law. Further, if removed, Petitioner faces possibility of indefinite incarceration and an unclear path to resettlement, including legal and economic integration. Edward Wong et al., *Inside the Global Deal-Making Behind Trump's Mass Deportations*, N.Y. Times, June 25, 2025.

These harms cannot be adequately remedied through monetary compensation. Respondents may argue that Petitioner may use the Federal Tort Claims Act (FTCA), 28 U.S.C. Section 2680(h) to seek monetary relief. However, sovereign immunity and the discretionary-function and international-tort exceptions would likely bar such a claim. *See, e.g., Douglas v. United States*, 796 F. Supp 2d 1354, 1367-69 (M.D. Fla. 2011) (dismissing a former immigration detainee's FTCA claims of false imprisonment and negligence following a warrantless arrest and detention that continued after probably cause dissipated). It is unlikely that Petitioner will ever receive adequate remedy for his continued unlawful detention and imminent deportation. Equitable relief is better suited to address these harms.

The damage to Petitioner's life, liberty, and pursuit of his legal claims cannot be measured by any accurate standard, making the threatened injury irreparable in nature.

C. The Balance of Equities and Public Interest Tips Sharply in Petitioner's Favor

The final two factors for preliminary injunctive relief weigh heavily in Petitioner's favor. As detailed above, Petitioner faces weighty hardships: loss of liberty, deprivation of the right to remain in the United States and all required due process, separation from his family and friends, and imminent removal to a country where he has no connections or legal status. Additionally, Petitioner has been living in the United States for over four years without incident, has no criminal history, and Respondents previously determined Petitioner was not a danger to the community or a flight risk and released him from detention. Nothing has changed since that individualized determination that would provoke re-detention. The harm to Petitioner if removed is irreversible.

In contrast, the government would suffer minimal harm from a brief delay in removal while the Court considers the merits of Petitioner's claims in his habeas petition. In fact, the public is better served by the faithful execution of immigration laws. Specifically, "the public interest benefits from an injunction that ensures that individuals are not deprived of their liberty and held in immigration detention because of . . . a likely [illegal] process." *Nken*, 556 U.S. at 435; *see also Rodriguez v. Robbins*, 715 F.3d 1127, 1145 (9th Cir. 2013) (finding the government "cannot suffer harm from an injunction that

merely ends an unlawful practice or read a statute as required to avoid constitutional concerns.").

In this case, the public interest is served by allowing for judicial review of the government's application of expedited removal to an individual, like Petitioner, who appears to be statutorily exempt from such proceedings. Ensuring that government agencies adhere to their statutory mandates promotes public confidence in the rule of law and the fair administration of justice. Further, it is against the public's interest to remove Petitioner from the United States without the proper due process of law.

Accordingly, the balance of hardships and the public interest favor a temporary restraining order to ensure that Respondents refrain from removing Petitioner before the Court reaches a decision on his habeas petition.

D. The Court Should Not Require a Security from Petitioner

Although Federal Rule of Civil Procedure 65(c) can require a security for a temporary restraining order, a district court has discretion as to the amount of security required, if any. *See Ajugwe v. Noem*, No. 8:25-CV-982-MSS-AEP, 2025 WL 1370212, at *10 (M.D. Fla. May 12, 2025) (exercising "discretion to waive the bond requirement in Fed. R. Civ. P. 65(c)"). No security is appropriate where there is no quantifiable harm to the restrained party and where the order is in the public interest. *Save Our Sonoran, Inc v. Flowers*, 408 F.3d 1113, 1126 (9th Cir. 2005). Given that Respondents are not likely

prejudiced by the issuance of this brief restraint and the issuance of the TRO is in the public interest, the Court should exercise its discretion to dispense with the security requirement.

V. CONCLUSION

For the foregoing reasons, Petitioner Carlos Luis Gonzalez Carmona respectfully requests that this Court enter a Temporary Restraining Order and/or Preliminary Injunction enjoining Respondents, their agents, officers, employees, and all persons acting in concert with them, from removing Petitioner from the United States pending final adjudication of his habeas corpus petition.

Respectfully submitted December 15, 2025.

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