

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

EDWIN MURALLES,
Petitioner,

v.

ERIC ROKOSKY, et al.,

Respondents.

Case No. 1:25-cv-18208

[Proposed] Temporary Restraining Order

Honorable Chief Judge Renée Marie Bumb
U.S.D.J.

MOTION FOR TEMPORARY RESTRAINING ORDER

Now comes the Petitioner, Edwin Gamaliel Muralles, by and through his undersigned counsel, and hereby moves for a Temporary Restraining Order enjoining the Respondents from moving the Petitioner outside the State of New Jersey during the pendency of these proceedings. In support of this motion, Petitioner avers the following:

Petitioner informed his immigration counsel that he believes he will be moved next week. Petitioner has observed that detainees at Elizabeth Contract Detention Facility are being transferred to other detention facilities outside New Jersey quickly and frequently.

It is undersigned counsel's experience that Petitioner will likely be moved to a staging area such as Arizona or Louisiana, and then funneled to a detention center in such places as Mississippi, Colorado, Texas, or beyond. This movement disrupts the attorney/client working relationship and places even more undue stress on

Petitioner's United States citizen wife and creates more grief and confusion for his two young United States citizen daughters.

Further, Petitioner is eligible for Cancellation of Removal as he has been living peacefully in the New York state for over twenty years. He has established roots and started a family with his United States citizen wife and daughters. He has never been arrested in the United States or anywhere in the world.

Petitioner being detained far afield in the United States, far away from his wife and young daughters, and far away from his immigration counsel, will cause irreparable harm to his ability to diligently prepare his applications for immigration relief. Undersigned counsel has experienced increasing difficulty in scheduling remote virtual visits with Petitioner and detained clients in general. Detainees in various detention centers have less and less access to their legal counsel, ostensibly because detention centers do not have the resources to provide virtual visits or even phone calls to detainees trying to work with their attorneys.

We respectfully request that this Honorable Court issue a Temporary Restraining Order enjoining Respondents from moving Petitioner outside the state of New Jersey during the pendency of this proceeding.

Based on these signed documents and under the Federal Rules of Civil Procedure 65 and the Local Rules of Civil Procedure 65.1, the Petitioner respectfully requests a Temporary Restraining Order in support of his Petition for Writ of Habeas Corpus.

Respectfully submitted this 5th day of December 2025.

Dated: December 5, 2025

Respectfully submitted,

/s/Matthew J. Archambeault

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CERTIFICATE OF SERVICE

I hereby certify that on December 5, 2025, I electronically filed the foregoing motion with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the parties of record.

/s/Matthew J. Archambeault

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