

**EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

Petitioner respectfully moves this Court for immediate injunctive relief to prevent irreparable harm.


1. Petitioner is scheduled for release on December 18, 2025.
2. BOP officials compelled Petitioner to sign immigration paperwork without explanation or voluntariness.
3. Petitioner was denied a copy of what he signed.
4. The paperwork is now being used to deny Petitioner Second Chance Act and halfway house eligibility.
5. Petitioner will suffer irreparable harm if transferred to ICE custody based on involuntary signature of documents.
6. Petitioner cannot wait for BOP's 20-day BP-9 timeline because the harm is immediate and ongoing.
7. The balance of equities favors preserving Petitioner's rights and preventing unlawful waiver.

Petitioner requests the Court:

- A. Order BOP to produce copies of any and all immigration-related forms Petitioner signed.
- B. Order BOP and ICE not to rely on any alleged waiver until the Court determines whether Petitioner signed voluntarily.
- C. Order BOP to immediately reconsider Petitioner's eligibility for halfway house placement.
- D. Issue any additional relief deemed necessary.

Respectfully,

Luis Enrique Castaneda-Reyes

Reg. No. 

12-02-25



CERTIFICATE OF SERVICE

I, Luis Enrique Castaneda-Reyes, Reg. No. [REDACTED] hereby certify that on the date below I placed the following documents in the institutional mail system at FCI Fort Dix, properly addressed and with first-class postage:

- Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241
- Emergency Motion for Temporary Restraining Order and Preliminary Injunction

A copy was mailed to:

United States Attorney's Office
District of New Jersey
970 Broad Street, Suite 700
Newark, NJ 07102

I declare under penalty of perjury that the foregoing is true and correct.

Date: 12-2-25

Signature: *Luis Castaneda*
Luis Enrique Castaneda-Reyes
Reg. No. [REDACTED]
FCI Fort Dix