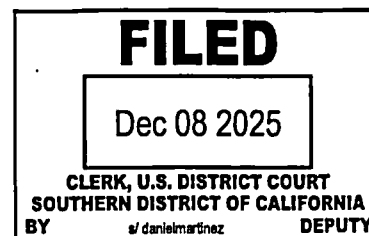


**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**



OKECHUKWU DESMOND AMADI

V.

WARDEN JEREMY CASEY
DIRECTOR OF U.S IMMIGRATION AND CUSTOMS
ENFORCEMENT (ICE); TODD LYONS
SECRETARY OF THE DEPARTMENT OF HOMELAND
SECURITY; KRISTEN NOEM
ATTORNEY GENERAL OF TH EUNITED STATES OF
AMERICA; PAM BONDI

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

Petitioner respectfully moves this court to enter an injunctive relief and temporary restraining order in order to preserve its jurisdiction if Respondents remove Petitioner to a country outside of the United States without notice to this Court as this court will be unable to provide relief if the petition proves to be meritorious.

Petitioner also respectfully requests this court to enjoin Respondents along with their agents, employees, successors, Attorneys, and all persons acting in concert with them, from removing Petitioner outside of the United States of America without notice or opportunity to be heard.

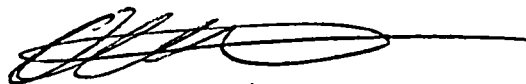
Petitioner also respectfully requests that as to the rest of his filings, including his request that the Court order him to be released and the court to adjudicate on the merits his arguments that the offense for which he was charged is not an aggravated felony that the court in addition consider this motion for injunctive relief under Rule 65(a) and provide the government with an opportunity to respond and set an expedited briefing schedule on the motion for Injunctive relief and Temporary restraining order.

Petitioner finally requests that court provides notice to all parties that it intends to consolidate the motion for injunctive relief with the determination on the merits under Rule 65 (a)(2). See Fed. R.Civ.P.65(a)(2); see also *Slidewaters LLC v. Wash. State Dep't of Lab & Indus*, 4 f.4 th 747, 759 (9 th Cir.2021) (noting the court can invoke Rule 65(a)(2) by giving clear and unambiguous notice”).

CONCLUSION

Petitioner prays that the court grant this motion

Respectfully submitted,



12/6/2025

Okechukwu Desmond Amadi