

Lauren Major
American Friends Service Committee
570 Broad St., Ste. 1001
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Pro Bono Counsel for Petitioner

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

CARLOS TORRES,

Petitioner,

v.

LUIS SOTO, in his official capacity as Director
of Delaney Hall;

TODD LYONS, in his official capacity as Acting
Director of the Immigration and Customs
Enforcement;

KRISTI NOEM, in her official capacity as
Secretary of the Department of Homeland
Security;

PAMELA BONDI, in her official capacity as
Attorney General of the United States;

Respondents.

Case No. 1:25-cv-18578

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

Petitioner respectfully requests that the Court grant his Motion for a Temporary Restraining Order and Preliminary Injunction. The grounds for this motion are set forth in the accompanying memorandum of law, exhibits in support thereof, the Complaint, and the applicable law. A proposed order also accompanies this motion.

Respectfully submitted,

/s/ Lauren Major

Lauren Major

Managing Attorney

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Immigrant Rights Program

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Pro Bono Counsel for Petitioner

Dated: December 15, 2025

CERTIFICATE OF SERVICE

I, undersigned counsel, hereby certify that on this date, I filed this Motion for Temporary Restraining Order and/or Preliminary Injunction and any attachments using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record. I further certify that I advised AUSA Frances C. Bajada of this filing on December 15, 2025, prior to its filing. In addition, I have emailed copies of these documents to AUSA Frances Bajada at the following email address:

frances.bajada@usdoj.gov

Respectfully submitted,

/s/ Lauren Major

Lauren Major

Managing Attorney

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