

harméd without an order of this Court; and the public interest favors the issuance of an injunction. This Motion is based on the pleadings, the Memorandum, the accompanying Declarations by Plaintiff, oral argument if granted by the Court, and such other evidence that may come before the Court in this case.

PRAYER FOR RELIEF

Upon the respective exhibits provided therewith, and the accompanying Memorandum of Law, Plaintiffs respectfully move this Court to enter a temporary restraining order and preliminary injunction (and thereafter Preliminary and Permanent Injunctive Relief) against Defendants and their officers, employees, or agents, and those acting on their behalf or in concert with them, as follows:

Respondents, their officers, agents, servants, employees, attorneys, and other persons acting on their behalf are immediately prohibited from removing Petitioner, Cristian Emilio Carbajal-Reyes, from the United States and from transferring him out of the jurisdiction of this Court. Unless extended by this Court, this Temporary Restraining Order is to expire thirty (30) days from its entry. No security bond is required under Federal Rule 65(c) because Respondents face no realistic likelihood of harm from this Order. *J.R. v. Bostock*, 2025 WL 1810210 at *4 (W.D. Wash. 2025) (citing *Jorgensen v. Cassidy*, 320 F.3d 906, 919 (9th Cir. 2003)).

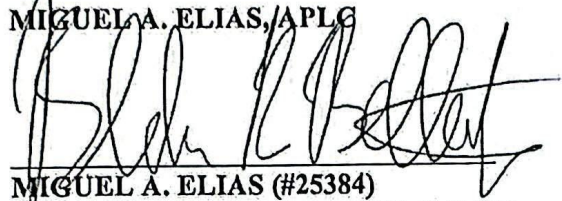
WHEREFORE, it is respectfully requested that this Court grant this application for a temporary restraining order and preliminary injunction.

DATED: December 15, 2025

[PLEASE SEE SIGNATURE BLOCK ON THE FOLLOWING PAGE.]

Respectfully submitted,

MIGUEL A. ELIAS, APLC



MIGUEL A. ELIAS (#25384)

BLAKE R. BELLEFONTAINE (#40697)

4224 Williams Boulevard
Kenner, Louisiana 70065
Telephone: 504/469-3300
Facsimile: 504/469-3353
Email: bbellefontaine@meliaslaw.com

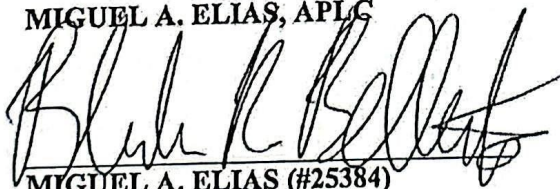
**CERTIFICATION OF NOTICE TO OPPOSING COUNSEL PURSUANT TO
FED. R. CIV. P. 65(b)(1)(B)**

Pursuant to Fed. R. Civ. P. 65(b)(1)(B), I certify that I have sent a copy of this pleading and associated documents to the captioned defendants, via either fax or email and I have additionally notified them by telephone.

DATED: December 15, 2025

Respectfully submitted,

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