

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

Hector Enrique Quinapanta Guangasig,

Petitioner,  
v.

Kristi Noem, et al.

Respondents.

Case No.

Judge:  
Magistrate Judge:

No request for jury trial

**PETITIONER'S MOTION FOR A  
TEMPORARY RESTRAINING ORDER  
AND PRELIMINARY INJUNCTION**

**ORAL ARGUMENT REQUESTED**

Pursuant to Fed. R. Civ. P. 65, Petitioner, Hector Enrique Quinapanta-Guangasig ("Petitioner"), by and through undersigned counsel, hereby moves this Court for a Temporary Restraining Order and a Preliminary Injunction enjoining the Respondents in the above captioned matter from removing him from the United States until further order of this court. In support of this Motion, Petitioner relies upon the Verified Petition for Writ of Habeas Corpus and the Memorandum of Points and Authorities in Support of this motion submitted herewith, and the exhibits submitted with those documents.


WHEREFORE, Petitioner respectfully prays that the Court:

- (a) grant Petitioner's Motion for a Temporary Restraining Order and Preliminary Injunction;
- (b) enter an Order enjoining Respondents and their agents from removing Petitioner Quinapanta-Guangasig from the United States until further order of the Court;
- (c) enter an Order requiring Respondents to notify Petitioner's counsel and the Court five days in advance of any imminent removal, and

(d) grant Petitioner such other, further and additional relief as the Court deems just and appropriate.

Dated: December 15<sup>TH</sup>, 2025  
White Plains, NY

Respectfully submitted,

By:   
\_\_\_\_\_  
Andrea C. Soto  
Attorney for the Petitioner  
445 Hamilton Avenue, Suite 407  
White Plains, NY 10601  
Phone: (914) 290-4900  
Email: [asoto@andreasotolaw.com](mailto:asoto@andreasotolaw.com)