

removal from the country or transfer from the forum of jurisdiction, until the petition can be fully considered. *See Santiago v. Noem*, No. 3-25-cv-361-KC, 2025 WL 2606118, at *2–3 (W.D. Tex. Sept. 9, 2025) (collecting cases). To ensure the Court’s ability to meaningfully address Petitioner’s claim, such is requested here.

3. To be clear, Petitioner does not seek a Temporary Restraining Order but instead a Protective Order under the Court’s inherent power to preserve and its ability to hear the case. *See, e.g., Order Concerning Service of Petition and Stay of Transfer or Removal, Teixeira v. ICE Burlington*, No. 25-cv-11631 (D. Mass. June 5, 2025), ECF No. 5; *see also Alves v. U.S. Dep’t of Just.*, No. 3-25-cv-306-KC, 2025 WL 2629763, at *5 (W.D. Tex. Sept. 12, 2025).

WHEREFORE PREMISES CONSIDERED, Petitioner requests that this Motion be granted.

Date: December 18, 2025

Respectfully submitted,

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