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9 Attorney for Petitioner

10
11 **IN THE UNITED STATES DISTRICT COURT**
12 **FOR THE DISTRICT OF ARIZONA**
13

14 **Ulises Poxtan Avendano,**)

15 Petitioner,)

16 v.)

17 **Luis Rosa Jr.,** Warden, Florence Correctional)
18 **Center; Chris McGregor,** Acting Director of)
19 **Phoenix Field Office, U.S. Immigration and**)
20 **Customs Enforcement; Todd Lyons,** Director,)
21 **U.S. Immigration and Customs Enforcement;**)
22 **Kristi Noem,** Secretary of the U.S. Department)
23 **of Homeland Security; and Pamela Bondi,**)
24 **Attorney General of the United States, in their**)
25 **official capacities.**)

26 Respondents.)

Case No. _____

PETITION FOR WRIT OF HABEAS
CORPUS

27 **PETITIONER’S EMERGENCY MOTION FOR**
28 **TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

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

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Respectfully submitted,

/s/ Maurice H. Goldman

Maurice H. Goldman

Goldman Immigration PC

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Counsel for Petitioner

Dated: December 17, 2025

VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I represent Petitioner, Mr. Poxtan Avendano, and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated this 17th day of December, 2025.

s/Maurice H. Goldman

Maurice H. Goldman