

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

ALBARRAN ARANDA, YELITZA

Petitioner,

v.

PAM BONDI, Attorney General of the
United States, KRISTI NOEM, Secretary
of the Department of Homeland Security,
TODD M. LYONS, Acting Director,
United States Immigration and Customs
Enforcement; LUIS SOTO, Director,
Delaney Hall Detention Facility,

Respondents.

Case No.

Hon.

**PETITION FOR TEMPORARY
RESTRAINING ORDER**

ORAL ARGUMENT REQUESTED

PETITIONER'S PETITION FOR TEMPORARY RESTRAINING ORDER

Pursuant to Fed. R. Civ. P. 65(b), Petitioner Yelitza Albarran Aranda, ("Petitioner"), hereby requests a temporary restraining order ("TRO") pending adjudication of their Petition for a Writ of Habeas Corpus and an order to show cause why a preliminary injunction should not issue pending the final disposition of their habeas petition. Petitioner is likely to succeed on the merits of their claim. Relief is necessary and appropriate to stop grave continuing injury and further irreparable harm to Petitioner.

Petitioner seeks a Temporary Restraining Order prohibiting Respondents, their officers, agents, employees, and all persons acting in concert with them from transferring Petitioner outside the District of New Jersey or otherwise removing her from the jurisdiction of this Court while her Petition for Writ of Habeas Corpus remains pending.

Petitioner is currently detained by U.S. Immigration and Customs Enforcement (“ICE”) at Delaney Hall Detention Facility in Newark, New Jersey, and is subject to transfer to a detention facility outside this District at any time.

Petitioner has filed a Petition for Writ of Habeas Corpus challenging the legality of her detention and alleging violations of her constitutional due process rights. Transfer of Petitioner outside this District would interfere with this Court’s ability to exercise jurisdiction over her habeas petition and would frustrate meaningful judicial review.

Petitioner has a pending immigration court hearing and viable claims for relief under the Immigration and Nationality Act. She is not a danger to the community and does not pose a flight risk. She has complied with all prior conditions of release and/or supervision.

Absent emergency injunctive relief, Petitioner faces irreparable harm, including disruption of attorney-client communication, diminished access to counsel, and the loss of this Court’s jurisdiction over her habeas claims. The balance of equities weighs sharply in Petitioner’s favor, and the requested relief serves the public interest by ensuring compliance with constitutional safeguards.

Accordingly, emergency relief is necessary to maintain the status quo pending resolution of Petitioner’s habeas petition and to protect her constitutional rights.

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