

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
WAYCROSS DIVISION

**ADONNIS ZAMBRANO**  
**VITERI,**

Petitioner

vs.

**TODD LYONS**, Acting Director,  
Immigration and Customs  
Enforcement, **KRISTI NOEM**,  
Secretary of United States  
Department of Homeland Security,  
**LADON FRANCIS**, Immigration  
and Customs Enforcement, Newark  
Field Office Director, **TONY**  
**NORMAND**, Director, Delaney  
Hall Detention Facility, **PAMELA**  
**BONDI**, United States Attorney  
General,

Respondents

) CASE NO.

) PETITIONERS' EX PARTE

) APPLICATION FOR

) TEMPORARY RESTRAINING

) ORDER AND ORDER TO SHOW  
) CAUSE

Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure, Petitioner hereby  
moves the Court for emergency relief in the form of a temporary restraining order directing  
Respondents to release Petitioner from their custody.

1 Petitioner also seeks a temporary restraining order enjoining the Respondents from  
2 relocating Petitioner outside of the Southern District of Georgia or the District of New Jersey  
3 pending final resolution of this case.

4 Petitioner further moves for the issuance of an order to show cause as to why a  
5 preliminary injunction should not issue.

6 In the alternative, if this Court does not order immediate release, Petitioner requests an  
7 individualized bond hearing to be scheduled within two days and to be heard in no more than 7  
8 days, in which the burden of proof is on the Government to prove by clear and convincing  
9 evidence that he is a flight risk or danger to the community.

10 This application is supported by the Memorandum of Points and Authorities,  
11 accompanying exhibits, as well as any additional submissions that may be considered by the  
12 Court.  
13

14 Respectfully submitted,

15 Date: December 23, 2025

16 /s/ Eric M. Mark

17 Eric M. Mark  
18 Law Office of Eric M. Mark  
19 96 Summer Ave., Fl. 1  
20 Newark, NJ 07104  
21 Tel: (973) 306-4246  
22 Email: [ericm@ericmarklaw.com](mailto:ericm@ericmarklaw.com)

23 /s/ Rachel Effron Sharma  
24 DreamPath Law, LLC  
25 5425 Peachtree Parkway NW  
Norcross, GA 30092  
[rachel@dreampathlaw.com](mailto:rachel@dreampathlaw.com)  
470-273-3444  
Local counsel

**PROOF OF SERVICE**

On December 23, 2025, I, Eric M. Mark, of full age, served the following documents by certified mail: **PETITIONERS' EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE** by placing a true and correct copy in a sealed envelope, each addressed as follows:

Kristi Noem  
U.S. Department of Homeland Security  
9707 Martin Luther King Jr Ave SE  
Washington, D.C. 20528

Todd Lyons  
U.S. Immigration and Customs Enforcement is:  
500 12th Street SW  
Washington, DC 20536

Ladeon Francis  
Acting Field Office Director  
Enforcement and Removal Operations  
Atlanta Field Office  
180 Ted Turner Dr. SW  
Suite 522  
Atlanta, GA 30303

Tony Normand, Warden  
Folkston ICE Processing Center  
3026 Hwy 252/ PO Box 98  
E Folkston, GA 31537

Pamela Bondi  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

U.S. Attorney's Office  
ATTN: Civil Process Clerk  
22 Barnard Street  
Suite 300  
Savannah, GA 31401

/s/ Eric M. Mark

Eric M. Mark, Esq.