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UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

\_\_\_\_\_  
ANGEL B. SANCHEZ SANCHEZ, )  
A  )  
Petitioner, )

Civil Action No. 2:25-cv-07310v

)  
PAMELA JO BONDI, )  
Attorney General of the )  
United States of America, )

MOTION FOR TEMPORARY  
RESTRAINING ORDER

)  
KRISTI NOEM, )  
Secretary of the Department of )  
Homeland Security, (DHS), )

)  
TODD LYONS, )  
Acting Director, )  
United States Immigration and )  
Customs Enforcement (ICE), and, )

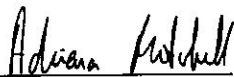
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THE WARDEN OF THE )  
PHILADELPHIA FEDERAL )  
DETENTION CENTER )  
Respondents. )  
\_\_\_\_\_ )

PLEASE TAKE NOTICE that as soon as counsel may be heard, the undersigned will move the Court, seeking a Temporary Restraining Order (“TRO”) in the form attached hereto and asking that this matter be set down for a hearing to convert those temporary restraints into a Preliminary Injunction pursuant to Fed. R. Civ. P. 65. In support of this motion, Petitioner submits the accompanying Memorandum of Law in Support of a Temporary Restraining Order and the concurrently filed Complaint.

WHEREFORE, Petitioner respectfully requests that this Court grant this Motion for a Temporary Restraining Order and issue an order (i) enjoining Respondents from moving him outside the Eastern District of Pennsylvania; (ii) enjoining Respondents from detaining Petitioner under 8 U.S.C. § 1225(b)(2); and (iii) ordering Petitioner’s immediate release from Respondents’ custody.

Respectfully Submitted,

Dated: December 22, 2025

  
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*Attorney for Petitioner*