

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS**

Jose Adonay Urbina Salazar,

Petitioner,

v.

Pamela Bondi, Attorney General,

4:25-cv-6147

Kristi Noem, Secretary, U.S. Department of
Homeland Security,

Department of Homeland Security,

Todd M. Lyons, Acting Director of
Immigration and Customs Enforcement,

Immigration and Customs Enforcement,

Miguel Vergara, Director, Harlingen Field
Office Immigration and Customs
Enforcement,

and,

Warden of Port Isabel Service Detention
Center

Respondents.

**EMERGENCY MOTION
FOR TEMPORARY
RESTRAINING ORDER**

EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER

For the reasons set forth in the accompanying memorandum, Petitioner hereby moves immediate and **emergency** basis for a Temporary Restraining Order (at such time as Respondent may be heard) prohibiting Respondents from moving Petitioner outside of the geographic boundaries of the Southern District of Texas for the duration of these proceedings.

Petitioner is a El Salvador national who has resided in the United States since 2013. Respondents took Petitioner into custody in Minnesota and transferred Petitioner to the Port Isabel Service Detention Center in Los Fresnos, Texas, where he remains.

Petitioner has been informed that Respondents will remove him on December 22, 2025. Petitioner has an order of withholding of removal under 8 U.S.C. § 1231(b)(3) that prohibits his removal to El Salvador. Petitioner also has not received notice of his removal to any third country in accordance with the Immigration & Nationality Act or Title 8 of the Code of Federal Regulations. Petitioner seeks an Emergency Temporary Restraining Order to prohibit his removal from the United States while this Petition for a Writ of Habeas Corpus is pending.

Petitioner hereby moves as follows:

1. Petitioner seeks an Emergency Temporary Restraining Order enjoining Respondents from moving Petitioner outside of the geographic boundaries of

the Southern District of Texas during this habeas proceeding.

WHEREFORE, Plaintiff respectfully requests this Court:

- A. Grant this Temporary Restraining Order; and,
- B. Grant such other and further relief as justice may require.

Respectfully submitted,

DATED: December 20, 2025

Respectfully submitted,

/s/ David L. Wilson

David L. Wilson

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Attorney for Petitioner

CERTIFICATE OF SERVICE

I, David L. Wilson, hereby certify consistent with LR5.3 that I served this filing on the opposing party via ECF and to the US Attorney's Office Public Email at txspublicinquiry@usdoj.gov & USATXS-CivilNotice@usa.doj.gov.

DATED: December 20, 2025

Respectfully submitted,

/s/ David L. Wilson

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