

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA

CLAUDIO MARIN CARDOSO,	)	CASE NO. 5:25-cv-251
	)	
Petitioner,	)	PETITIONER'S EX PARTE
	)	APPLICATION FOR
vs.	)	TEMPORARY RESTRAINING
	)	ORDER AND ORDER TO SHOW
	)	CAUSE
TODD LYONS, Acting	)	
Director, Immigration	)	
and Customs Enforcement,	)	
KRISTI NOEM, Secretary	)	
of United States	)	
Department of Homeland	)	
Security, LADRON	)	
FRANCIS, Immigration and	)	
Customs Enforcement,	)	
Atlanta Field Office	)	
Director, TONY NORMAND,	)	
Warden, Folkston ICE	)	
Processing Center,	)	
PAMELA BONDI, United	)	
States Attorney General,	)	
Respondents.		

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 with no conditions of release, such as GPS monitoring, that would constitute de facto custody, or to provide Petitioner with an individualized bond hearing before an immigration judge pursuant to 8 U.S.C. § 1226(a) with the burden of proof on the Government

to prove by clear and convincing evidence that he is a flight risk or danger to the community.

Petitioner also seeks a temporary restraining order enjoining the Respondents from relocating Petitioner outside of the Southern District of Georgia pending final resolution of this case.

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

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

Respectfully submitted,

Date: December 24, 2025

/s/Rachel Effron Sharma
Rachel Effron Sharma
DreamPath Law, LLC
5425 Peachtree Pkwy NW
Norcross, GA 30092
Tel 470-273-3444
rachel@dreampathlaw.com
local counsel

By:/s/ Eric M. Mark
Eric M. Mark
Law Office of Eric M. Mark
96 Summer Ave., Fl. 1
Newark, NJ 07104
Tel: (973) 306-4246
Pro hac vice motion pending

PROOF OF SERVICE

On December 24, 2025, I, Eric M. Mark, of full age, served the following documents: **PETITIONERS' PETITION FOR WRIT OF HABEAS CORPUS** by certified mail, 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.