

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Ronil Jose GONZALEZ CENTENO,


Petitioner,

v.

Craig LOWE, *et al.*,

Respondents.

Case No. 3:25-cv-02518-JKM

**MOTION FOR TEMPORARY
RESTRAINING ORDER**

TO: The Clerk of Court and Counsel for Respondents.

PLEASE TAKE NOTICE that Petitioner, Ronil Jose Gonzalez Centeno, by and through undersigned counsel, hereby moves this Honorable Court for a Temporary Restraining Order (TRO) and Immediate Release pursuant to 28 U.S.C. § 2243 and Fed. R. Civ. P. 65.

This motion is based on the binding, nationwide class certification and partial summary judgment rulings issued by the United States District Court for the Central District of California in *Maldonado Bautista et al. v. Santacruz Jr. et al.*, Case No. 5:25-cv-01873-SSS-BFM, which conclusively establishes that Petitioner's detention under 8 U.S.C. § 1225(b)(2) is unlawful.

Petitioner seeks immediate release, rather than a delayed bond hearing, because the systemic inability of the Executive Office for Immigration Review

(EOIR) to process the thousands of affected class members within a constitutional timeframe constitutes immediate, irreparable injury.

In support of this motion, Petitioner submits the accompanying Memorandum of Law in Support of a Temporary Restraining Order.

WHEREFORE, Petitioner respectfully requests that this Court grant this Motion for a Temporary Restraining Order and issue an Order (i) enjoining Respondents from detaining Petitioner under 8 U.S.C. § 1225(b)(2); (ii) granting the Petition for Writ of Habeas Corpus; and (iii) ordering Petitioner's immediate release from Respondents' custody.

Dated: December 31, 2025

Respectfully submitted,

/s/ Karen L. Hoffmann

Karen L. Hoffmann, Esquire

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CERTIFICATE OF SERVICE

I hereby certify that on this date, I caused to be served a copy of Petitioner's Motion for Temporary Restraining Order and all accompanying documents on the following by CM/ECF and e-mail:

Timothy Judge
Timothy.judge@usdoj.gov
Richard Euliss
Richard.euliss@usdoj.gov
U.S. Attorney's Office
Middle District of Pennsylvania

Dated: December 31, 2025

/s/Karen L. Hoffmann
Karen L. Hoffmann, Esq.