

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

\_\_\_\_\_  
 SAMER ANTONIO PUENTES CERA, )  
 A ~~XXXXXXXXXX~~ )  
 Petitioner, )  
 )  
 )  
 PAMELA JO BONDI, )  
 Attorney General of the )  
 United States of America, )  
 )  
 KRISTI NOEM, )  
 Secretary of the Department of )  
 Homeland Security, (DHS), )  
 )  
 TODD LYONS, )  
 Acting Director, )  
 United States Immigration and )  
 Customs Enforcement (ICE), and, )  
 )  
 THE WARDEN OF THE )  
 PHILADELPHIA FEDERAL )  
 DETENTION CENTER )  
 Respondents. )  
 \_\_\_\_\_ )

Civil Action No. 2:25-cv-7406 v.

MOTION FOR TEMPORARY  
RESTRAINING ORDER

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,

Date: January 1, 2026

//s// Adriana Mitchell  
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