


Adriana Mitchell, Esq.
Law Office of Adriana Mitchell
1528 Walnut Street, Suite 1402
Philadelphia, PA 19102
Phone: 877-728-1496
adriana@mitchellimmigration.com
Pennsylvania Bar ID: 323243

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JUAN DAVID LOPEZ YEPES)
A )
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. 2:26-cv-00002

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 _____
Adriana Mitchell
PA Bar #: 323243
Law Office of Adriana Mitchell
1528 Walnut St, Suite 1402
Philadelphia, PA 19102
p. 877-728-1496
adriana@mitchellimmigration.com
ATTORNEY FOR PETITIONER