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*Counsel for Petitioner Kevin Eliel Aguirre Solis*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA (Las Vegas)**

**KEVIN ELIEL AGUIRRE SOLIS**

*Petitioner,*

v.

**KRISTI NOEM, U.S. DEPARTMENT OF  
HOMELAND SECURITY, PAMELA J.  
BONDI, U.S. DEPARTMENT OF  
JUSTICE, TODD LYONS, BRIAN  
HENKEY, U.S. IMMIGRATION AND  
CUSTOMS ENFORCEMENT, AND  
JOHN MATTOS,**

*Respondents.*

Case No.: 2:26-cv-53

**APPLICATION FOR A TEMPORARY RESTRAINING ORDER**

Kevin Eliel Aguirre Solis (“Petitioner” or “Mr. Aguirre Solis”) is presently detained by U.S. Immigration and Customs Enforcement (“ICE”). Pursuant to Rule 65 of the Federal Rules of Civil Procedure and the All Writs Act, Petitioner hereby applies for a temporary restraining order or preliminary injunction requiring that Respondents grant Petitioner a custody

1 redetermination hearing on the merits. This Application is not intended to be made or  
2 considered ex parte. Petitioner requests that the Court screen the Petition and order service on  
3 Respondents, including service of this Application.

4 As set forth in the accompanying Memorandum of Law, Respondents are detaining  
5 Petitioner in violation of the Immigration and Nationality Act. In the absence of a temporary  
6 restraining order or preliminary injunction, Petitioner will suffer irreparable injury through  
7 continued illegal detention.  
8

9  
10 DATED this 23rd day of January, 2026.

11  
12 Respectfully Submitted,

13 /s/Michael Kagan  
14 Michael Kagan  
15 Nevada Bar. No. 12318C

16 /s/Tia Zghaib  
17 Tia Zghaib  
18 Student Attorney Practicing  
Under Nevada Supreme Court Rule 49.3

19 /s/Raymond Wu  
20 Raymond Wu  
21 Student Attorney Practicing  
Under Nevada Supreme Court Rule 49.3

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