

Julio Cesar Arnedo

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Karen Polo as Next Friend

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Julio Cesar Arnedo, and  
Karen Polo as Next Friend.  
*Petitioner,*

**26 CV 0244**

Civil Action No.:

v.

**LAWRENCE CATLETTI**, in his official capacity as Colonel of Correctional Command Staff for Orange County, New York;

**MARCUS CHARLES**, in his official capacity as acting Executive Associate Director, Enforcement and Removal Operations;

**WILLIAM JOYCE**, in his official capacity as Acting New York Field Office Director for U.S. Immigration and Customs Enforcement;

**KRISTI NOEM**, in her official capacity as Secretary, U.S. Department of Homeland Security;

**TODD LYONS**, in his official capacity as Director, U.S. Immigration and Customs Enforcement; U.S. Department of Homeland Security; and U.S. Immigration and Customs Enforcement

*Respondents.*

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**PETITIONER'S NOTICE OF EMERGENCY MOTION FOR A TEMPORARY  
RESTRAINING ORDER**

**Moving Party:** Plaintiff-Petitioner

**Place:** United States District Court for the Southern District of New York  
David Patrick Moynihan Courthouse  
500 Pearl Street  
New York, 10007

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**Relief Sought:** Pursuant to Federal Rules of Civil Procedure 65(b)(2) (“Fed. R. Civ. P.”), Petitioner respectfully moves the Court for a temporary restraining order pending adjudication of his/her Complaint and Verified Petition for Writ of Habeas Corpus (“Petition”)

**Papers Submitted in Support:** Petition and Exhibits thereto and Memorandum of Law

**Intent to Reply:** Petitioner respectfully requests the opportunity to respond to any responses filed by Respondents to the instant motion.

Dated: 1/7/26  
New York, NY

Respectfully submitted,

Karen polo  
Petitioner (pro se)