UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION

DANIEL CASTILLO CEPERO, *Petitioner*, vs. DAVID HARDIN, ET AL., *Warden of the Glades County Detention Center,* *Respondents.*	§	2:26-cv-00053-KCD-DNF **EMERGENCY EX PARTE MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION** *Points and Authorities in Support of Emergency Ex Parte Motion for Temporary Restraining Order and Preliminary Injunction (Challenge to Unlawful Detention Under 8 U.S.C. § 1226(a); Request for Immediate Release or Constitutionally Adequate Custody Hearing)*

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NOTICE OF MOTION

In accordance with Federal Rule of Civil Procedure 65(b)(1)(B), Petitioner Daniel Castillo Cepero ("Mr. Castillo" or "Petitioner") submits this motion ex parte because immediate and irreparable injury will occur before Respondents can be heard in opposition. The need for judicial intervention is immediate.

Mr. Castillo filed a Petition for a Writ of Habeas Corpus on January 26, 2026, challenging his custody on the ground that he is indefinitely detained under 8 U.S.C. § 1226(a), not § 1225(b). Under § 1226(a), he is entitled to a custody redetermination hearing before a neutral decision-maker or release on reasonable conditions. (Dkt. 1) Respondents have provided neither.

Despite nearly four years of residence in the United States, full compliance with all immigration requirements, and a pending asylum application, Mr. Castillo has now been detained for months without any individualized custody determination. The immigration judge has declined jurisdiction and ICE has not responded to his December 12, 2025 Request for Release. As a result, Mr. Castillo remains detained without the procedural protections required by the Due Process Clause of the Fifth Amendment.

Federal courts in this District have already addressed this precise issue. The Middle District of Florida has held that detainees at Glades in materially identical circumstances are detained under § 1226(a) and must receive a bond hearing or be released. See, e.g., *Padilla Orellana v. Warden*, Glades Cnty. Det. Ctr., No. 2:25-cv-01195 (M.D. Fla. Jan. 6, 2026); *Hinojosa Garcia v. Sec'y of Homeland Sec.*, No. 2:25-cv-00879 (M.D. Fla. Oct. 31, 2025); *Vasquez Carcamo v. Noem*, No. 2:25-cv-00922 (M.D. Fla. Nov. 7, 2025). Respondents identify no material distinction between those cases and Mr. Castillo's.

Mr. Castillo brings this emergency motion because irreparable harm is not theoretical here; it is imminent and ongoing. Mr. Castillo's next hearing is scheduled for March 5, 2026. (Ex. 1) Importantly, Mr. Castillo has a deadline to reply to Motion to Pretermit the Asylum Application based on the ACA ("Asylum Cooperative Agreement") with Ecuador. Under the current law the Immigration Judge will grant the DHS' Motion to Pretermit.

In similar cases where Habeas Petitions have been granted and a Bond Hearing has been conducted with a positive result; the DHS has filed a Motion to Reconsider the Bond Hearing Decision and the Immigration Judge has reversed his decision based on Change of Circumstances. (Ex. 2).

Without immediate intervention from this Court, Mr. Castillo will continue to suffer the deprivation of his liberty in violation of federal law and due process. He faces the risk of removal or continued unlawful detention without a constitutionally adequate hearing.

Petitioner respectfully requests that this Court issue an order:

1. Enjoining Respondents from continuing to detain him under an unlawful interpretation of the Immigration and Nationality Act ("INA");

2. Ordering his immediate release under reasonable conditions of supervision,

3. Prohibiting Respondents from re-arresting him absent a constitutionally adequate custody determination;

4. Prohibiting Respondents from removing him from the United States while this litigation is pending; and

5. Ordering Respondents to produce his complete administrative file maintained by the U.S. Department of Homeland Security ("DHS") and the U.S. Department of Justice ("DOJ").

As set forth in the accompanying points and authorities, Mr. Castillo satisfies all factors for emergency injunctive relief. His liberty interest is weighty, his detention is unlawful, and the ongoing deprivation of due process constitutes irreparable harm.

INTRODUCTION

1. This case revolves around one simple statutory point: a person detained under 8 U.S.C. § 1226(a) cannot be held indefinitely without the custody hearing that the statute and its regulations require. Congress made that choice, and yet the government has not followed it. Instead, the government is imposing a system of unchecked confinement that the INA does not authorize and that the Constitution does not tolerate.

2. Mr. Castillo has lived in the United States since 2022. He was previously released on a Form I-220A and complied with every requirement imposed on him, including routine check-ins. Nothing about his conduct changed. The only change was ICE's unexplained decision to re-detain him. Because he is detained under 8 U.S.C. § 1226(a), the statute governing custody for individuals already present in the United States and placed in removal proceedings, he is entitled to a bond hearing before a neutral decisionmaker.

3. The implementing regulations make the aforementioned requirement explicit.

4. Since October 20, 2025, Respondents have refused to provide any individualized custody determination. The immigration judge declined jurisdiction, ICE has not responded to his Request for Release, and no lawful mechanism for custody review has been made available. The result is detention without the procedures that make § 1226(a) detention lawful.

5. Federal courts in this District have repeatedly rejected Respondents' position. In a series of recent decisions involving detainees at Glades County Detention Center, the Middle District of Florida has held that individuals in materially identical circumstances are detained under § 1226(a) and not § 1225(b). Therefore, must receive a bond hearing or be released. See

Padilla Orellana v. Warden, Glades Cnty. Det. Ctr., No. 2:25-cv-01195 (M.D. Fla. Jan. 6, 2026); *Hinojosa Garcia v. Sec'y of Homeland Sec.*, No. 2:25-cv-00879 (M.D. Fla. Oct. 31, 2025); *Vasquez Carcamo v. Noem*, No. 2:25-cv-00922 (M.D. Fla. Nov. 7, 2025). Respondents identify no material distinction between those cases and Mr. Castillo's, and they offer no reason as to why Mr. Castillo should be treated differently.

6. Mr. Castillo's continued detention without a bond hearing violates the plain text of the INA, longstanding agency practice, and binding Supreme Court precedent. See *Jennings v. Rodriguez,* 583 U.S. 281, 306 (2018) (recognizing that noncitizens detained under § 1226(a) receive bond hearings under federal regulations). It also violates the Due Process Clause, which prohibits the government from depriving a person of liberty through arbitrary or unreviewed detention.

7. Respondents' refusal to provide any custody review deprives Petitioner of both statutory and constitutional rights and constitutes ongoing irreparable harm. Immediate relief is necessary to halt the unlawful detention and to ensure that Mr. Castillo can meaningfully participate in his removal proceedings.

I. STATEMENT OF FACTS

1. Petitioner Daniel Castillo Cepero ("Mr. Castillo") is a Cuban national who entered the United States on March 16, 2022, at San Luis, Arizona. He was processed by DHS and released on a Form I-220A Order of Release on Recognizance. Since that date, he has lived openly in the United States and complied with every requirement imposed on him.

2. Removal proceedings have been pending against Mr. Castillo since September 7, 2022. He filed his asylum application on August 7, 2024, and submitted an amended application on December 17, 2025. He has pursued his case diligently and has complied with all court and agency obligations.

3. On October 20, 2025, Mr. Castillo appeared for a routine check-in at the ICE Miramar office. He had committed no violation and had complied with every prior check-in. Without any allegation of changed circumstances and without providing any explanation, ICE re-detained him. He is currently at the Glades County Detention Center, located at 1297 SR 78, Moore Haven, Florida 33471.

4. Following his detention, Mr. Castillo sought a custody redetermination hearing on December 4, 2025. The immigration judge declined to hear the request, stating that he lacked jurisdiction. Mr. Castillo renewed his request, but the immigration judge again refused to hold a hearing. On January 20, 2026, the immigration judge issued a written order again denying custody redetermination.

5. On December 12, 2025, Mr. Castillo submitted a written Request for Release to ICE. He received no response. ICE has not acknowledged the request, provided a custody

determination, or offered any explanation for the continued detention. The absence of any administrative review has left Mr. Castillo without the procedures that ordinarily govern custody under 8 U.S.C. § 1226(a).

6. Mr. Castillo has strong and longstanding ties to the United States. His mother, Rosa M. Cepero Gonzalez (A# [redacted]), is a lawful permanent resident. His fiancée, Mistaidy Garcia, is also a lawful permanent resident, and the couple is preparing for marriage. His life, family, and future are firmly rooted in this country. He has lived in the United States for nearly four years, maintained a stable residence, and complied with every requirement imposed on him since his release on a Form I-220A.

7. Nothing in Mr. Castillo's history suggests that he is a danger to society or a flight risk.

8. The consequences of Mr. Castillo's detention have been significant. Mr. Castillo has been unable to assist in preparing his asylum case, gather evidence, or meaningfully consult with counsel. His detention has also imposed hardship on his family, who rely on him for emotional, financial, and practical support. These burdens have been compounded by the lack of any lawful mechanism for custody review.

9. Despite his compliance history, his family ties to lawful permanent residents, years of residence, and his pending asylum application, Mr. Castillo remains indefinitely detained solely because ICE and the immigration judge have declined to provide the custody hearing required for individuals detained under § 1226(a). No statutory or regulatory authority has been identified to justify continued detention without such a hearing.

10. Mr. Castillo is being denied the basic procedural protections that Congress expressly

provides to individuals detained under 8 U.S.C. § 1226(a). In the absence of those required procedures, his continued confinement lacks any lawful foundation and leaves him without access to the constitutional protections that guard against arbitrary detention.

II. PROCEDURAL BACKGROUND

1. Petitioner's removal proceedings have been pending before the immigration court since September 7, 2022. After his release on a Form I-220A in 2022, Mr. Castillo proceeded in non-detained removal proceedings and prepared his case accordingly. He filed his application for asylum on August 7, 2024, and submitted an amended application on December 17, 2025.

2. On October 20, 2025, Mr. Castillo appeared for a routine check-in at the ICE Miramar office. At that appointment, ICE abruptly re-detained him without prior notice, without alleging any change in circumstances, and without providing any explanation. He remains at the Glades County Detention Center.

3. Following his re-detention, Mr. Castillo sought a bond hearing on December 4, 2025, but the immigration judge declined to consider the request, stating that he lacked jurisdiction.

4. Petitioner renewed his request, but the immigration judge again refused to hold a hearing. On January 20, 2026, the immigration judge issued a written order denying custody redetermination, expressly finding that "[n]o material change in circumstances [was] shown since the prior bond redetermination." (Ex. 3, IJ Order dated Dec. 12, 2025.)

5. On December 12, 2025, Mr. Castillo submitted a Request for Release to ICE. ICE has not responded, nor has it provided any explanation for the continued detention.

6. While detained, Petitioner received a Notice of Hearing dated December 18, 2025, scheduling his next immigration court appearance for March 5, 2026, at 1:00 p.m. before the Miami Immigration Court via Webex.

7. Mr. Castillo remains detained without access to a custody redetermination hearing, despite his long-standing residence in the United States, his pending asylum application, and his strong family ties to lawful permanent residents.

8. His detention continues without the procedural protections that Congress provided to individuals detained under 8 U.S.C. § 1226(a), leaving him confined without the statutory or constitutional safeguards that make such detention lawful.

III. LEGAL STANDARD

1. The purpose of a temporary restraining order ("TRO") is to preserve the status quo and prevent irreparable harm until the Court may hold a full hearing. *Granny Goose Foods, Inc. v. Bhd. Of Teamsters & Auto Truck Drivers Local No. 70*, 415 U.S. 423, 439 (1974).
2. In the Eleventh Circuit, a party seeking a TRO or preliminary injunction must establish:

   (1) a substantial likelihood of success on the merits;

   (2) a substantial threat of irreparable injury absent relief;

   (3) that the threatened injury outweighs any harm the injunction may cause the opposing party; and

   (4) that the injunction would not be adverse to the public interest.

   Siegel v. LePore, 234 F.3d 1163, 1176 (11th Cir. 2000) (en banc); *Schiavo ex rel. Schindler v. Schiavo*, 403 F.3d 1223, 1225–26 (11th Cir. 2005).
3. All four requirements listed above must be satisfied. *Wreal, LLC v. Amazon.com, Inc.*, 840 F.3d 1244, 1247 (11th Cir. 2016).
4. As demonstrated below, Mr. Castillo satisfies each element. His continued detention without access to a custody redetermination hearing establishes a substantial likelihood of success on the merits, presents an imminent and ongoing threat of irreparable harm, and tips the balance of equities decisively in his favor. The public interest is likewise served by ensuring adherence to federal law and the constitutional guarantees that govern civil immigration detention.

ARGUMENT

A. Petitioner Warrants a Temporary Restraining Order

(i) Petitioner Is Likely to Succeed on the Merits of His Claims

1. The Immigration and Nationality Act, 8 U.S.C. § 1101 et seq., establishes the statutory framework governing civil immigration detention. Mr. Castillo is detained under 8 U.S.C. § 1226(a), and detention under that statute is lawful only when the government follows the procedures that govern it.
2. Section 1226(a) authorizes temporary, discretionary detention during removal proceedings, but only through the procedures Congress and the Department of Justice established. Those procedures are mandatory and codified in the regulations implementing § 1226(a).
3. Granted, Congress has authorized mandatory detention in narrow circumstances like the one set out in § 1226(c), *Demore v. Kim*, 538 U.S. 513, 514 (2003); however, that provision does not apply here. Mr. Castillo has no disqualifying convictions, and the government has never invoked § 1226(c). His detention is governed solely by § 1226(a).
4. Under 8 C.F.R. § 236.1(d)(1), ICE must issue an initial custody determination and must allow the detainee to request review. Under 8 C.F.R. § 1236.1(d)(1), an immigration judge is authorized to conduct a custody redetermination hearing for individuals detained under § 1226(a). As the Supreme Court has recognized, these regulations provide that noncitizens detained under § 1226(a) receive bond hearings at the outset of detention. *See Jennings v. Rodriguez*, 583 U.S. 281, 306 (2018).
5. Respondents did not follow these requirements. ICE never issued a custody determination, and the immigration judge refused to conduct a bond hearing.
6. The government's failure to follow the regulations that implement § 1226(a) independently establishes Petitioner's likelihood of success. Agencies must follow the regulations that govern

their exercise of statutory authority. See *United States ex rel. Accardi v. Shaughnessy*, 347 U.S. 260, 267–68 (1954). Because the government disregarded the procedures that make § 1226(a) detention lawful, Mr. Castillo's continued confinement exceeds the authority Congress conferred.

7. The Supreme Court has likewise held that agencies must follow the procedures they establish to govern their own actions. *See Morton v. Ruiz*, 415 U.S. 199, 235 (1974). The government cannot rely on internal guidance or ad hoc practices to circumvent the mandatory regulatory framework that implements § 1226(a).

8. Instead of applying § 1226(a), the immigration judge treated Mr. Castillo as if he were detained under 8 U.S.C. § 1225(b), a statute that applies only to certain "applicants for admission" and strips immigration judges of bond authority. That classification is incorrect. Mr. Castillo entered the United States in 2022, was released on a Form I-220A, and has been in § 240 removal proceedings since September 2022. He is not an arriving alien and cannot be placed in § 1225(b) detention years after his entry.

9. This Court has already rejected the government's attempt to impose § 1225(b) mandatory detention on noncitizens who, like Mr. Castillo, entered the United States long before ICE initiated enforcement action. *See Padilla Orellana v. Warden*, Glades Cnty. Det. Ctr., No. 2:25-cv-01195-SPC-NPM (M.D. Fla. Jan. 6, 2026). The same statutory framework applies here.

10. The government's position also mirrors the arguments rejected in *Hinojosa Garcia v. Sec'y of Homeland Sec.*, No. 2:25-cv-879-SPC-NPM (M.D. Fla. Oct. 31, 2025), *and Vasquez Carcamo v. Noem*, No. 2:25-cv-922-SPC-NPM (M.D. Fla. Nov. 7, 2025), where the Court held that detention of noncitizens who had entered the United States long before ICE enforcement was governed by § 1226(a), not § 1225(b).

11. The misclassification here stems from DHS's July 8, 2025 policy memorandum instructing ICE

officers to treat individuals charged under § 1182(a)(6)(A)(i) as "applicants for admission" regardless of their actual entry history. See Todd Lyons, Memorandum, *ICE Interim Guidance Regarding Detention Authority for Applicants for Admission* (July 8, 2025). The immigration judge's reliance on that memorandum to disclaim jurisdiction is a legal error because internal guidance cannot override the statutory and regulatory framework governing § 1226(a) detention.

12. The immigration judge denied Mr. Castillo's renewed request for a custody hearing on the ground that "[n]o material change in circumstances" had been shown. See Ex. 3 (IJ Order dated Dec. 12, 2025). That rationale presupposes a prior bond determination, but none exists. ICE never issued a custody decision, and the immigration judge has never conducted a bond hearing. The "no material change" rationale is therefore inapplicable.

13. The immigration judge's refusal to exercise jurisdiction contradicts the plain text of 8 C.F.R. § 1236.1(d)(1), which expressly authorizes immigration judges to conduct custody redetermination hearings for individuals detained under § 1226(a). Detention without the procedures that make it lawful exceeds the authority Congress conferred and is inconsistent with the regulatory framework that governs its use.

(ii) <u>Petitioner Will Suffer Irreparable Harm</u>

1. Mr. Castillo faces irreparable harm each day that he remains detained without the custody hearing required by § 1226(a) and its implementing regulations. The loss of physical liberty is an irreparable injury, and courts have long recognized that unlawful detention cannot be remedied after the fact. Continued confinement without the procedures that make § 1226(a) detention lawful is an ongoing deprivation that no later remedy can undo. *See Schiavo ex rel. Schindler v. Schiavo*, 403 F.3d 1223, 1241 (11th Cir. 2005) ("the immediate irreparable injury is not only possible, it is imminent"); *Siegel v. LePore*, 234 F.3d 1163, 1176 (11th Cir. 2000) (en

banc) (same).

2. His continued detention also impairs his ability to prepare his asylum case, gather evidence, and consult meaningfully with counsel. Courts have recognized that restrictions that impede access to counsel or the ability to pursue legal claims constitute irreparable harm in the injunction context. *See Swain v. Junior*, 958 F.3d 1081, 1090–91 (11th Cir. 2020) (recognizing irreparable harm where conditions impede the ability to protect legal rights).
3. Importantly, if a Bond Hearing is ordered and before his release his Asylum is Pretermitted, the DHS will move to reconsider the Bond Decision arguing change in circumstances and now his detention will be controlled by 8 USC 1231(a)(2)(A).
4. This scenario will guarantee his continued detention without having had the right to a Bond Hearing under the law.
5. The deadline to reply to the DHS' Motion to Pretermit is February 16, 2026. Therefore, the Immigration Judge can issue the decision to Pretermit the Asylum at any time after that.
6. The harm is not speculative. Mr. Castillo remains detained in a facility where conditions have been the subject of repeated scrutiny. Public reporting and oversight findings have documented concerns about access to counsel, medical care, and basic conditions in ICE detention facilities, including in Florida. See, e.g., DHS Office of Inspector General, *Summary of Unannounced Inspections of ICE Facilities Conducted in Fiscal Years 2020–2023 (2024)*; Miriam Jordan & Jazmine Ulloa, *Concerns Grow Over Dire Conditions in Immigrant Detention*, N.Y. Times (July 1, 2025); NPR, *The Conditions in ICE Detention Centers* (Sept. 24, 2025). These conditions heighten the risk of irreparable harm for individuals who, like Mr. Castillo, remain detained without the bond hearing that the law requires.
7. Because the injury to Mr. Castillo's liberty and ability to pursue his legal claims cannot be repaired once lost, the irreparable-harm requirement is satisfied. *See Wreal, LLC v. Amazon.com,*

Inc., 840 F.3d 1244, 1247 (11th Cir. 2016) (irreparable harm exists where the injury is actual and cannot be undone).

(iii) The Balance of Equities and the Public Interest Favor Granting the Temporary Restraining Order ("TRO")

1. The balance of equities decisively favors Mr. Castillo. He seeks only the release it has been denied or the custody hearing that § 1226(a) and its regulations already require. Granting that relief imposes no cognizable burden on the government, which is obligated to follow the statutory and regulatory framework Congress established. A temporary restraining order directing compliance with existing law preserves the status quo and prevents ongoing harm while this Court considers the merits. See *Granny Goose Foods, Inc. v. Bhd. of Teamsters*, 415 U.S. 423, 439 (1974).
2. The public interest independently supports relief. Section 1226(a) is a discretionary detention framework, and detention under that statute must remain within the limits Congress enacted. *See Zadvydas v. Davis*, 533 U.S. 678, 689–90 (2001). Ensuring adherence to those statutory boundaries promotes the fair and lawful administration of the immigration system. The public has a strong interest in the government following the procedures Congress and the Department of Justice have put in place for custody determinations. See *Mathews v. Diaz*, 426 U.S. 67, 77 (1976).
3. The government's attempt to apply § 1225(b) to an individual who entered the United States years ago and has been in § 240 proceedings since 2022 is inconsistent with the statutory structure. The Supreme Court has emphasized that detention categories must be applied consistently with their text and limits. *See Clark v. Martinez*, 543 U.S. 371, 380–81 (2005). Requiring the government to follow the statutory and regulatory framework Congress enacted serves the public interest in lawful, accountable government action.

4. The public interest also favors preventing ongoing harm that cannot be remedied later. The Eleventh Circuit has explained that equitable relief is appropriate where the injury is actual and cannot be undone. *See Wreal, LLC v. Amazon.com, Inc.*, 840 F.3d 1244, 1247 (11th Cir. 2016). Continued detention without the hearing required by § 1226(a) is precisely such an injury. Ordering the government to provide the required hearing protects both the individual interest in liberty and the public interest in ensuring that detention authority is exercised within lawful bounds.

CONCLUSION

For the foregoing reasons, Mr. Castillo respectfully requests that this Court grant a Temporary Restraining Order and, after hearing, a Preliminary Injunction ordering that Respondents:

(1) Be restrained from continuing to detain Petitioner based on their incorrect interpretation of the Immigration and Nationality Act;

(2) Immediately release Petitioner from immigration detention;

(3) Order Respondents not to re-arrest him until he is afforded a hearing before a neutral decision-maker, as required by the Due Process clause of the Fifth Amendment;

(4) Be prohibited from deporting him from the United States while this litigation remains pending; and

(5) Be ordered to file with this Court a complete copy of Petitioner's administrative file from the Department of Justice and the Department of Homeland Security.

Respectfully submitted on February 11, 2026,

Ismael J. Labrador, Esq.
Attorney for Petitioner
FL Bar No.: 1030508
Gallardo Law Firm
8492 SW 8th St
Miami, FL 33144-4153
Telephone: 305-261-7000
Email: ismaeljose@gallardolawyers.com

VERIFICATION PURSUANT TO FED. R. CIV. P. 65 (b)(1)

I am submitting this verification on behalf of Petitioner because I am one of Petitioner's attorneys. I have discussed with the Petitioner the events described in this TRO. Based on those discussions, I hereby verify that the factual statements in the attached Motion for Temporary Restraining Order are true and correct to the best of my knowledge.

Executed on this 11th day of February 2026

Ismael J. Labrador
Attorney for Petitioner
Fl. Bar. No. 1030508
GALLARDO LAW FIRM, P.A.
ismaeljose@gallardolawyers.com

CERTIFICATE OF CONFERENCE

In accordance with Federal Rule of Civil Procedure 65(b)(1)(B), Mr. Castillo respectfully submits this motion ex parte because immediate and irreparable injury will occur before Respondents can be heard in opposition.

Respectfully submitted on February 11, 2026,

Ismael J. Labrador, Esq.
Attorney for Petitioner
FL Bar No.: 1030508
Gallardo Law Firm
8492 SW 8th St
Miami, FL 33144-4153
Telephone: 305-261-7000
Email: ismaeljose@gallardolawyers.com

CERTIFICATE OF SERVICE

I hereby certify that on February 11, 2026, I electronically filed the foregoing Emergency Ex Parte Motion for Temporary Restraining Order with the Clerk of Court using the CM/ECF system.

Ismael J. Labrador, Esq.
Attorney for Petitioner
FL Bar No.: 1030508
Gallardo Law Firm
8492 SW 8th St
Miami, FL 33144-4153
Telephone: 305-261-7000
Email: ismaeljose@gallardolawyers.com