

A Number: 

PRO SE

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

**Alioune Sembene, and Marie Ndiaye, as
Next Friend**

Petitioners/Plaintiffs,

v.

**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/Defendants.

Civil Action No.:

**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

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: January 13, 2026
New York, NY

Respectfully submitted,

s/ Marie Ndiaye
Marie Ndiaye



Next Friend of Petitioner (pro se)