

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SANDRO MANUEL ESPINOZA
LOPEZ

Petitioner,

-against-

KRISTI NOEM, in her capacity as
Secretary for the United States
Department of Homeland Security;

LADEON FRANCIS, Field Office
Director of New York, Immigration and
Customs Enforcement, in his official
capacity,

PAMELA BONDI, in her official
capacity as the Attorney General of the
United States,

Respondents.

Case No. 26-345 / 1:26-cv-345(JHR)

**MOTION FOR TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

Petitioner Sandro Manuel Espinoza Lopez respectfully requests, in accordance with the Federal Rule of Civil Procedure Rule 65, that this

Honorable Court grant a Temporary Restraining Order (“TRO”) and Preliminary Injunction against Respondents because, as demonstrated in the attached memorandum of law and other supporting documents, his detention by Respondents is unlawful. Petitioner therefore requests an order enjoining Respondents from transferring him outside this Court’s jurisdiction.

Compliance With Federal Rule of Civil Procedure Rule 65

Petitioner’s Counsel served these documents on the United States Attorney’s Office for the Southern District of New York on January 15, 2026 in compliance with Federal Rule of Civil Procedure 65(b)(1).

Dated: New York, NY
January 15, 2026

Respectfully submitted,

By: /s/ Paul Grotas
Paul B. Grotas, Esq
THE GROTTAS FIRM, P.C.
499 Seventh Avenue, Suite 23N
New York, NY 10018
917-436-4444

