

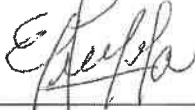
**EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER (FED.
R. CIV. P. 65)**

Petitioner respectfully moves for a Temporary Restraining Order restraining Respondent from continuing Petitioner's detention without lawful authority pending adjudication of the habeas petition.

Petitioner demonstrates a likelihood of success on the merits because ICE has failed to identify any statutory basis for detention or provide a custody determination.

Petitioner faces irreparable harm from continued unlawful detention, the balance of equities favors Petitioner, and the public interest is served by ensuring constitutional compliance.

Respectfully submitted,



Eddna Rosydel Milla
Next Friend to Petitioner

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U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK