


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

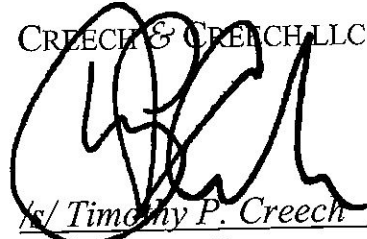
IBRAHIMA MBODJ	:	
A#: 	:	
	:	Petitioner,
	:	
	:	C.A. No.: <u>2:26-cv-00263</u>
	:	
v.	:	
	:	
WARDEN OF THE FEDERAL DETENTION	:	
CENTER PHILADELPHIA; and	:	
	:	
MICHAEL ROSE, <i>In his official capacity as</i>	:	
<i>Acting Field Office Director of Philadelphia ICE</i>	:	
<i>ERO</i> ; and	:	
	:	
TODD LYONS, <i>In his official capacity as Acting</i>	:	
<i>Director of ICE</i> ; and	:	
	:	
KRISTI NOEM, <i>In her official capacity as DHS</i>	:	
<i>Sec'y of DHS</i> ; and	:	
	:	
PAMELA BONDI, <i>In her official capacity as</i>	:	
<i>U.S. Attorney General</i> ,	:	
	:	
	:	Respondents.
	:	

EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER

Petitioner Ibrahim Mbodj, by and through undersigned counsel, respectfully moves this Court for a Temporary Restraining Order pursuant to Fed.R.Civ.P. 65. This motion is filed contemporaneously with Petitioner's Verified Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241. The reasons and authorities for this Motion are set forth in the attached Memorandum of Law. A proposed Order in compliance with Fed.R.Civ.P.65(b)(2) is attached.

Respectfully submitted,

CREECH & CREECH LLC

A handwritten signature in black ink, appearing to read 'TC', is written over the text 'CREECH & CREECH LLC' and the text 's/ Timothy P. Creech'.

s/ Timothy P. Creech

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DATED: January 15, 2026