

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA DIVISION**

<b>Juan Rafael Cabreja Bueno,</b>	:	
	:	Case No. 2:26-cv-00304
Petitioner,	:	
	:	
v.	:	
	:	
<b>Warden,</b> Philadelphia Federal Detention Center,	:	
Philadelphia, PA,	:	
	:	
<b>David O’Neill,</b> Acting Field Office Director,	:	
Philadelphia Field Office Immigration and	:	
Customs Enforcement,	:	
	:	
<b>Kristi Noem,</b> Secretary U.S. Department of	:	
Homeland Security	:	
	:	:
<b>Pam Bondi,</b> Attorney General, U.S. Department	:	
of Justice,	:	
	:	
Executive Office for Immigration Review,	:	
	:	
Respondents.	:	
	:	

**MOTION FOR TEMPORARY RESTRAINING ORDER**

PLEASE TAKE NOTICE that as soon as counsel may be heard, the undersigned will move the Court, seeking a Temporary Restraining Order (“TRO”) in the form attached hereto and asking that this matter be set down for a hearing to convert those temporary restraints into a Preliminary Injunction pursuant to Fed. R. Civ. P. 65. In support of this motion, Petitioner submits the accompanying Memorandum of Law in Support of a Temporary Restraining Order and the concurrently filed Petition.

WHEREFORE, Petitioner respectfully requests that this Court grant this Motion for a Temporary Restraining Order and issue an order (i) enjoining Respondents from moving him

outside the Eastern District of Pennsylvania; (ii) enjoining Respondents from detaining Petitioner under 8 U.S.C. § 1225(b)(2); and (iii) ordering Petitioner's immediate release from Respondents' custody.

Date: January 16, 2026

Respectfully submitted,

/s/ David M. Bercovitch  
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Bueno