

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION

Jhair Fran Alvarez Navarro,	:	
	:	Case No. <u>2:26-cv-00305</u>
Petitioner,	:	
	:	
v.	:	
	:	
Warden, Philadelphia Federal Detention Center,	:	
Philadelphia, PA,	:	
	:	
David O’Neill, Acting Field Office Director,	:	
Philadelphia Field Office Immigration and	:	
Customs Enforcement,	:	
	:	
Kristi Noem, Secretary U.S. Department of	:	
Homeland Security	:	
	:	
Pam Bondi, 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.

Respectfully submitted,

Date: January 17, 2026

/s/ David M. Bercovitch
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