

Maria H. Chaluisa Enriquez A# [REDACTED]
[REDACTED] A# [REDACTED] (minor son)
Next Friend Juan H. Cuyo Chaluisa

PRO SE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

FILED

JAN 14 2026

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY [REDACTED] DEPUTY CLERK

Maria H. Chaluisa Enriquez
[REDACTED] (minor child)
Juan H. Cuyo Chaluisa as Next Friend.

Petitioners/Plaintiffs,

v.

JOSE RODRIGUEZ, Jr., facility
administrator at Dilley Immigration
Processing Center
SYLVESTER ORTEGA, Immigration
and Customs Enforcement San Antonio
Acting Field Office Director
KRISTI NOEM, in her official capacity as
Secretary, U.S. Department of Homeland
Security;
TODD LYONS, in his official capacity as
Director, U.S. Immigration and Customs
Enforcement; U.S. Department of
Homeland Security and Customs
Enforcement.

Respondents.

SA 26 CA 0216 JKP

Civil Action No.:

PETITIONER'S NOTICE OF EMERGENCY MOTION FOR A TEMPORARY
RESTRAINING ORDER

Maria H. Chaluisa Enriquez A# [REDACTED]
[REDACTED] (minor son)
Next Friend Juan H. Cuyo Chaluisa

PRO SE

Moving Party: Plaintiff-Petitioner
Maria H. Chaluisa Enriquez A# [REDACTED] detained
[REDACTED] minor child, detained
Next Friend Jose H. Chaluisa Enriquez

Place: United States District Court for the Western District of Texas
San Antonio Division
U.S. District Clerk's Office
262 West Nueva Street, Room 1-400
San Antonio, Texas 78207

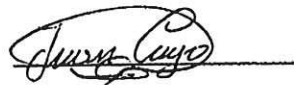
Relief Sought: Pursuant to Federal Rules of Civil Procedure 65(b)(2)
("Fed. R. Civ. P."), Petitioner respectfully moves the Court for a
temporary restraining order pending adjudication of his/her
Complaint and Verified Petition for Writ of Habeas Corpus
("Petition")

Papers Submitted in Support: Petition and Exhibits thereto and Memorandum of Law

Intent to Reply: Petitioner respectfully requests the opportunity to respond to any
responses filed by Respondents to the instant motion.

Dated: 1/8/26
New York, NY

Respectfully submitted,



Petitioner (pro se)

Maria H. Chaluisa Enriquez A# [REDACTED]
[REDACTED] (minor son)
Next Friend Juan H. Cuyo Chaluisa

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Respondents/Defendants.

SA 26 CA 0216

JKP

Civil Action No.:

[PROPOSED] ORDER

Upon consideration of Petitioner's Motion for a Temporary Restraining Order, the Memorandum of Law in Support of the Motion and the Complaint and Verified Petition and Exhibits thereto, IT IS HEREBY ORDERED that:

1. Respondents are ORDERED to file a return as to why the Petition and temporary restraining order should not be granted by _____;

Maria H. Chaluisa Enriquez A# [REDACTED]

PRO SE

(minor son)

Next Friend Juan H. Cuyo Chaluisa

2. Petitioner shall have an opportunity to reply by _____;
3. This matter shall be heard by the Court on _____;
4. Pending consideration, Respondents ARE HEREBY RESTRAINED from removing Petitioner from the United States;
5. Pending consideration, Respondents ARE HEREBY RESTRAINED from moving Petitioner unless seventy-two (72) hours written notice of any movement is provided to Petitioner's next friend;
6. And such other and further relief as the Court may find appropriate;
7. Service of this Order shall be made by Petitioner on the United States Attorney for the Western District of Texas on [Date]_____ and shall constitute good and sufficient service.

IT IS SO ORDERED.

//

DATED _____, 2026	
San Antonio, TX	Hon.
	United States District Judge