

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GUTIERREZ FLORES,
Petitioner,

v.

FEDERAL DETENTION CENTER
PHILADELPHIA, et al.,
Respondents.

Case No. 2:26-cv-00404

Honorable Jeffrey L. Schmehl

Motion for Temporary
Restraining Order

MOTION FOR TEMPORARY RESTRAINING ORDER

Now comes the Petitioner, Rene Gutierrez Flores, by and through his undersigned counsel, and hereby moves for a Temporary Restraining Order enjoining the Respondents from moving Petitioner outside the Commonwealth of Pennsylvania during the pendency of these proceedings. In support of this motion, Petitioner avers the following:

It is undersigned counsel's experience that Petitioner will likely be moved to a staging area such as Arizona or Louisiana, and then funneled to a detention center in such places as Mississippi, Colorado, Texas, or beyond. This movement disrupts the attorney/client working relationship and places even more undue stress on Petitioner's wife and loved ones.

Further, Petitioner has a pending Petition for U Nonimmigrant Status and has been living peacefully in Philadelphia, Pennsylvania since his last entry in

2003. He has established roots in the Philadelphia community with his wife and adult children. Petitioner has lived in Northeast Philadelphia for over twenty years. He has worked the same job for over twenty years in construction and currently owns his construction business. Petitioner and his wife belong to their local church where they attend bible study, volunteer, and have established roots in their community. Petitioner has never been arrested in the United States or anywhere in the world.

Petitioner being detained far afield in the United States, away from his wife and immigration counsel, will cause irreparable harm to his ability to diligently prepare his applications for immigration relief. Undersigned counsel has experienced increasing difficult in scheduling remote virtual visits with detained clients repeatedly transferred to detention centers across the country. Detainees in various detention centers have less and less access to their legal counsel, ostensibly because detention centers do not have the resources to provide virtual visits or even phone calls to detainees trying to work with their attorneys.

We respectfully request this Honorable Court issue a Temporary Restraining Order enjoining Respondents from moving Petitioner outside the Commonwealth of Pennsylvania during the pendency of this proceeding.

Based on these signed documents and under the Federal Rule of Civil Procedure 65 and the Local Rule of Civil Procedure 65.1, the Petitioner

respectfully requests a Temporary Restraining Order in support his Petition for Writ of Habeas Corpus.

Dated: January 22, 2026

Respectfully submitted,

/s/Pretty S. Martinez

Pretty S. Martinez

Law Office of Matthew Archambeault

216 Haddon Avenue, Suite 402

Haddon Township, NJ 08108-2812

prettysmartinez@archambeaultlaw.com

(856) 890-9320

PA Bar ID: 329658