

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION

Sergei Alekseev,

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.

Case No. 2:26-cv-462

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 25, 2026

/s/ David M. Bercovitch
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