


UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

\_\_\_\_\_  
CARLOS MARTINEZ CRUZ  
A   
*Petitioner,*  
  
v.  
  
KRISTI NOEM, et al.,  
*Respondents.*  
\_\_\_\_\_

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)  
) Case No. 1:26-cv-312-DDD  
)  
)  
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)  
) MOTION FOR A TEMPORARY  
) RESTRAINING ORDER AND/OR A  
) PRELIMINARY INJUNCTION  
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On January 26, 2026, Petitioner Carlos Martinez Cruz filed a petition for a writ of habeas corpus based on his unlawful immigration detention. See ECF No. 1. For the reasons in Mr. Martinez’s memorandum of law, he now seeks a temporary restraining order and/or a preliminary injunction precluding Respondents from further detaining him in violation of his Constitutional rights.

January 26, 2026

Respectfully submitted,  
  
/s/ Sarah L. Vuong  
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**CERTIFICATE OF COUNSEL**

Pursuant to Local Rule 65.1, I certify that on January 25, 2026, I sent a copy of the petition and accompanying exhibits as well as a copy of this motion and the accompanying memorandum in support to the United States Attorney's Office for the District of Colorado via email service to the Civil Chief, Kevin Traskos, at kevin.traskos@usdoj.gov.

January 26, 2026

Respectfully submitted,

/s/ Sarah L. Vuong

SARAH L. VUONG

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