

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

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		)
		) <b>Case No. 1:26-cv-355</b>
ALEX ARMANDO MARTINEZ-		)
ORELLANA,		)
		)
<i>Petitioner</i>		)
		)
v.		) <b>MOTION FOR TEMPORARY</b>
		) <b>RESTRAINING ORDER AND/OR</b>
ROBERT HAGAN, <i>et al.</i> ;		) <b>PRELIMINARY INJUNCTION</b>
		)
<i>Respondents</i>		)
		)
_____		)

On January 29, 2026, Petitioner Alex Armando Martinez-Orellana filed a petition for a writ of habeas corpus on the basis that his immigration detention violates the Immigration and Nationality Act, the Administrative Procedure Act, as well as his substantive and procedural due process rights. *See* ECF No. 1. Due to the clear indication from Respondents that they will not comply with the statute or due process absent order from this Court, Mr. Martinez-Orellana seeks a temporary restraining order and/or a preliminary injunction precluding Respondents from further detaining him in violation of law and his Constitutional rights.

January 29, 2026

Respectfully submitted,  
*/s/ Jessica A. Dawgert*  
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**CERTIFICATE OF COUNSEL**

Pursuant to Local Rule 65.1, I certify that on January 29, 2026, I sent 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 29, 2026

Respectfully submitted,

/s/ Jessica A. Dawgert

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