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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
ABILENE DIVISION

1:26-cv-042-H

**EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER  
AND REQUEST FOR IMMEDIATE RELIEF**

**(IN SUPPORT OF 28 U.S.C. § 2241 HABEAS PETITION)**

Petitioner, ALIESKYS VENEGA SANABRIA (A# XXXXXXXXXX), by and through his Next Friend, ANAYSA DEL SOL LEAL, respectfully moves this Honorable Court for the issuance of an Emergency Temporary Restraining Order (“TRO”) against Respondents, pursuant to Rule 65 of the Federal Rules of Civil Procedure, to prevent irreparable harm while this Court considers the pending Petition for Writ of Habeas Corpus and related motions.

**I. FACTUAL EMERGENCY**

Petitioner is detained at the Bluebonnet Detention Facility under conditions that pose an immediate and serious threat to his health, safety, and constitutional rights. He has been subjected to racial discrimination, psychological harassment, coercion to sign deportation documents, denial of hygiene products, spoiled food, rationed water, and denial of adequate medical care despite suffering from high fever and illness.

**II. LEGAL STANDARD FOR TRO**

A Temporary Restraining Order is warranted where the movant demonstrates (1) a substantial likelihood of success on the merits; (2) a substantial threat of irreparable harm; (3) that the balance of equities favors relief; and (4) that the injunction serves the public interest. See *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7 (2008).

**III. ARGUMENT**

**A. LIKELIHOOD OF SUCCESS ON THE MERITS**

Petitioner has demonstrated clear constitutional violations, including unlawful arrest, due process violations, and unconstitutional conditions of confinement. See *Zadvydas v. Davis*, 533 U.S. 678 (2001); *Bell v. Wolfish*, 441 U.S. 520 (1979).

**B. IRREPARABLE HARM**

Continued detention under abusive and medically dangerous conditions constitutes irreparable harm. Physical injury, psychological trauma, and coerced removal cannot be remedied after the fact.

**C. BALANCE OF EQUITIES**

Petitioner poses no danger to the community and no flight risk. The harm to Petitioner far outweighs any speculative harm to Respondents.

**D. PUBLIC INTEREST**

The public interest is served by ensuring constitutional compliance, humane treatment, and protection against unlawful detention and forced removal.

**IV. RELIEF REQUESTED**

WHEREFORE, Petitioner respectfully requests that this Court:

1. Issue an Emergency Temporary Restraining Order prohibiting Respondents from

### V. VERIFICATION

I, Anaysa del Sol Leal, declare under penalty of perjury that the foregoing is true and correct.



\_\_\_\_\_  
Anaysa del Sol Leal

Next Friend for Petitioner

Date: 01/27/2026

UNITED STATES DISTRICT COURT  
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### PROPOSED ORDER GRANTING TEMPORARY RESTRAINING ORDER

Upon consideration of Petitioner's Emergency Motion for Temporary Restraining Order, the Court finds that Petitioner has demonstrated a substantial likelihood of success on the merits, a substantial risk of irreparable harm, and that the balance of equities and public interest weigh in favor of granting emergency relief.

IT IS HEREBY ORDERED that:

1. Respondents, their agents, employees, and all persons acting in concert with them, are TEMPORARILY RESTRAINED from removing, deporting, or transferring Petitioner, ALIESKYS VENEGA SANABRIA (A# ) from the United States;
2. Respondents shall immediately cease any form of harassment, coercion, retaliation, or intimidation against Petitioner;
3. Respondents shall provide Petitioner with immediate and adequate medical care, including evaluation, treatment, and necessary medication;
4. Respondents shall ensure adequate access to food, water, and hygiene products;
5. This Temporary Restraining Order shall remain in effect pending further order of this Court.

SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE