

his partner and her son (who he has raised as his child). Petitioner has lived in Bensalem for over four years. He has been steadily employed for over four years - has worked the same job for about three years at a pizzeria and prior to that worked as a landscaper. Petitioner and his family belong to their local church where they have found friendship 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 family and immigration counsel, will cause irreparable harm to his ability to diligently prepare his applications for immigration relief. Undersigned counsel has experienced increasing difficulty 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: February 6, 2026

Respectfully submitted,

/s/Pretty S. Martinez

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

CUJI VIMOS,
Petitioner,
v.
FEDERAL DETENTION CENTER
PHILADELPHIA, et al.,
Respondents.

Case No. 2:26-cv-708

Temporary Restraining Order

After reviewing the Motion for Temporary Restraining Order preventing Respondents from moving Petitioner Darwin Armando Cuji Vimos outside the Commonwealth of Pennsylvania during the pendency of this proceeding, it is hereby ordered as follows:

The Motion is hereby granted.

IT IS SO ORDERED.

Dated:

U.S.D.J.