

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

T.A.,

*Petitioner,*

- against -

**Jessica SAGE**, in her official capacity as Warden of FCI Lewisburg; **David O'NEILL**, in his official capacity as Acting Field Office Director, Philadelphia Field Office, U.S. Immigration and Customs Enforcement; **Todd M. LYONS**, in his official capacity as Acting Director, U.S. Immigration and Customs Enforcement; **Kristi NOEM**, in her official capacity as Secretary of the U.S. Department of Homeland Security; and **Pam BONDI**, in her official capacity as Attorney General of the United States;

*Respondents.*

No.

**PETITIONER'S APPLICATION FOR ORDER TO SHOW CAUSE AND  
PRELIMINARY INJUNCTION AND/OR TEMPORARY RESTRAINING ORDER**

In light of Petitioner's prolonged immigration detention which threatens his liberty and physical and mental safety, Petitioner respectfully moves this Court for a temporary restraining order or preliminary injunction requiring Respondents to release Petitioner and enjoining them continuing to detain Petitioner during the pendency of this petition, or alternatively to order Petitioner's release from Respondent's custody pursuant to this Court's inherent authority.

Counsel for Petitioner provided notice of Petitioner's intent to file this application to counsel for Respondents at the U.S. Attorney's Office for the Western District of Pennsylvania.

Brooklyn, NY

February 6, 2025

Respectfully submitted,

/s/ Erica Rodarte

Erica Rodarte (PA Bar No. 332762) \*

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\* *Application for admission pending*