

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 imminent threat of being removed to a country where he may face torture or death, and to preserve the Court's jurisdiction pending a ruling on his Petition, Petitioner respectfully moves this Court for a temporary restraining order or preliminary injunction enjoining Respondents from removing him from the United States. 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 Middle 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*