

FILED - USDC - NDTX - SA
FEB 12 '26 PM 1:54

EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER
(ULTRA - FEDERAL JUDGE LEVEL)
(ANTI-TRANSFER / ANTI-REMOVAL / ANTI-THIRD-COUNTRY)
(28 U.S.C. § 2241)

6:26-cv-00049

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
SAN ANGELO DIVISION

ÁNGEL DANIEL MORAN QUIROGA,
Petitioner,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY; IMMIGRATION AND CUSTOMS
ENFORCEMENT (ICE);
WARDEN, EDEN DETENTION CENTER,
Respondents.

COMES NOW Petitioner, Ángel Daniel Moran Quiroga, by and through his Next Friend, Norberto E. Martínez Romero, and respectfully moves this Honorable Court for the issuance of an EMERGENCY TEMPORARY RESTRAINING ORDER pursuant to Rule 65 of the Federal Rules of Civil Procedure, 28 U.S.C. § 2241, and the Fifth Amendment.

I. INTRODUCTION

This Motion seeks immediate injunctive relief to prevent irreparable harm to Petitioner, including unlawful transfer, removal, or deportation to a third country, while this Court reviews the pending Petition for Writ of Habeas Corpus.

II. FACTUAL BASIS FOR EMERGENCY RELIEF

Petitioner has been subjected to arbitrary detention, repeated transfers, inhumane conditions, denial of medical care, and credible threats of retaliation. Absent immediate court intervention, ICE may transfer or remove Petitioner at any time, mooting this Court's jurisdiction.

III. LEGAL STANDARD

A Temporary Restraining Order is warranted where the movant demonstrates (1) likelihood of success on the merits, (2) irreparable harm, (3) balance of equities in his favor, and (4) that an injunction serves the public interest. *Winter v. Natural Resources Defense Council*, 555 U.S. 7 (2008).

IV. ARGUMENT

A. Likelihood of Success on the Merits

Petitioner has demonstrated substantial constitutional violations under the Fifth Amendment. See *Zadvydas v. Davis*; *Bell v. Wolfish*; *Farmer v. Brennan*.

B. Irreparable Harm

Removal, transfer, or third-country deportation would cause irreparable harm and permanently deprive this Court of jurisdiction.

C. Balance of Equities and Public Interest

The equities strongly favor preserving life, health, and access to judicial review.

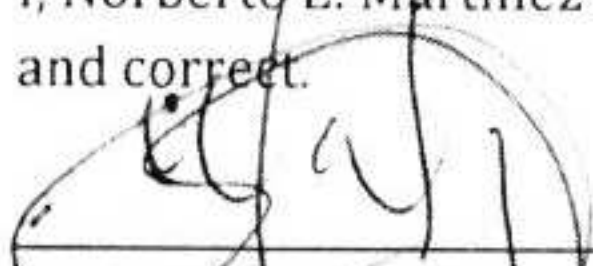
V. REQUEST FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court issue a Temporary Restraining Order:

1. Prohibiting ICE from transferring Petitioner to any other facility;
2. Prohibiting ICE from removing or deporting Petitioner from the United States;
3. Prohibiting ICE from transferring Petitioner to any third country;
4. Maintaining Petitioner at Eden Detention Center pending further order;
5. Granting such other relief as the Court deems just.

VI. VERIFICATION

I, Norberto E. Martínez Romero, declare under penalty of perjury that the foregoing is true and correct.



Norberto E. Martínez Romero
Next Friend for Petitioner

Date: 2-2-2026

PROPOSED ORDER

Upon consideration of Petitioner's Emergency Motion for Temporary Restraining Order, the Court finds that immediate injunctive relief is warranted.

IT IS HEREBY ORDERED THAT:

1. Respondents are ENJOINED from transferring Petitioner;
2. Respondents are ENJOINED from removing or deporting Petitioner;
3. Respondents are ENJOINED from transferring Petitioner to any third country;
4. This Order shall remain in effect pending further order of the Court.

SO ORDERED.

UNITED STATES DISTRICT JUDGE

Date: _____