

UNITED STATES DISTRICT COURT
DISTRICT OF COLORADO

FILED
UNITED STATES DISTRICT COURT
DENVER, COLORADO

MAR 27 2026

JEFFREY P. COLWELL
CLERK

MARCOS EFRAIN CASTRO PU (A# )

Petitioner,

v.

PAM BONDI, Attorney General of the United States;

SECRETARY, U.S. Department of Homeland Security (DHS);

TODD M. LYONS, Acting Director, U.S. Immigration and Customs Enforcement
(ICE);

Field Office Director, ICE Enforcement and Removal Operations (ERO), Denver
Field Office;

AND ALL OTHER PERSONS HAVING CUSTODY OF PETITIONER

Respondents.

Case No.: 1:26-cv-00680-RTG

**EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER
PREVENTING TRANSFER AND MEMORANDUM OF LAW**

Petitioner respectfully moves this Court for a Temporary Restraining Order preventing transfer outside the jurisdiction of this Court while the habeas petition is pending.

Federal courts possess authority to preserve habeas jurisdiction and prevent transfers that could interfere with judicial review.

In *Ex parte Endo*, 323 U.S. 283 (1944), the Supreme Court recognized that courts may act to preserve their jurisdiction in habeas proceedings.

In *Rumsfeld v. Padilla*, 542 U.S. 426 (2004), the Supreme Court reaffirmed the importance of custodian rule and territorial jurisdiction in habeas cases.

The Eleventh Circuit has recognized the importance of protecting habeas jurisdiction. See *Cotterall v. Paul*, 755 F.2d 777 (11th Cir. 1985).

Courts frequently enter anti-transfer orders in immigration detention cases to prevent the government from frustrating judicial review.

Petitioner therefore requests an order preventing transfer while this habeas petition is pending.

Respectfully submitted,

Marcos Efrain Castro PU

MARCOS EFRAIN CASTRO PU (Pro Se)



DENVER CONTRACT DETENTION FACILITY

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Date: March 26, 2026