

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

<b>Nadia GONZALEZ</b>	)	<b>CASE NO. 1:26</b> _____
<b>RIVERA</b>	)	
	)	<b>PETITIONER'S</b>
Petitioner,	)	<b>APPLICATION FOR</b>
	)	<b>TEMPORARY RESTRAINING</b>
vs.	)	<b>ORDER AND ORDER TO SHOW</b>
	)	<b>CAUSE</b>
<b>CRAIG OWENS, Cobb</b>	)	
<b>County Sheriff, KRISTI</b>	)	
<b>NOEM, Secretary</b>	)	
<b>Department of Homeland</b>	)	
<b>Security;</b>	)	
<b>TODD LYONS, Director,</b>	)	
<b>Immigration Customs</b>	)	
<b>Enforcement; PAMELA</b>	)	
<b>BONDI, Attorney General;</b>	)	
<b>NICK ANNAN, Director,</b>	)	
<b>Atlanta ICE Field Office</b>	)	

Respondents.

Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure, Petitioner hereby moves the Court for emergency relief in the form of a temporary restraining order directing Respondents not to transfer the Petitioner outside the jurisdiction of the Northern District of Georgia pending final resolution of this case. Petitioner has a hearing on Tuesday, February 24, 2026 at which time her no license case will resolve and the ICE detainer will take effect.

Petitioner resides in the Northern District of Georgia. Respondents Kristi Noem, Todd Lyons, Nick Annan and Pamela Bondi have the ability to transfer her to any detention center in

ICE's vast network, removing her from her husband, three minor US citizen children, and her counsel. She asks that she remain here in her community, where she has resided since 2007 pending the adjudication of her writ of habeas corpus.

Petitioner further moves that the order direct Respondents to release Petitioner from their custody with no conditions of release, such as GPS monitoring, that would constitute *de facto* custody, or to provide Petitioner with an individualized bond hearing before an immigration judge pursuant to 8 U.S.C. § 1226(a) with the burden of proof on the Government to prove by clear and convincing evidence that he is a flight risk or danger to the community.

Petitioner further moves for the issuance of an order to show cause as to why a preliminary injunction should not issue.

This application is supported by the writ of habeas and attached exhibits that may be considered by the Court.

Respectfully submitted,

This 19<sup>th</sup> Day of February, 2026.



Rachel Effron Sharma  
DreamPath Law, LLC  
5425 Peachtree Parkway NW  
Norcross, GA 30092  
rachel@dreampathlaw.com  
Tel: (470) 273-3444