

**PETITIONER'S EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
NORTHERN DIVISION**

EMMANUELLA AGUH

Plaintiff / Petitioner,

v.

DEPARTMENT OF HOMELAND SECURITY;
PAMELA BONDI, in her official capacity
as Attorney General of the United States;
KRISTI NOEM, in her capacity as
Secretary of the United States Department
of Homeland Security;
TODD M. LYONS, in his official capacity
as Acting Director of the United States
Immigration and Customs Enforcement.

Respondents.

Case No. _____

**PETITIONER'S EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

Petitioner, Emmanuella Aguh, respectfully requests that the Court grant her Emergency Motion for a Temporary Restraining Order and Preliminary Injunction. The grounds for this motion are set forth below.

Petitioner is a twenty-nine-year-old female who is a resident of Maryland was working under authorization of the Optional Practical Training for F-1 Students after her graduation from

Texas Tech University. Through her habeas petition, Petitioner is challenging her detention by Immigration and Customs Enforcement (“ICE”). She seeks immediate injunctive relief to protect her from ongoing and imminent harm caused by Respondents’ transfer of her out of Maryland and into another state.

As argued in Petitioner’s habeas petition, Petitioner was detained by ICE without a valid judicial warrant on or about February 24, 2026, and her detention is therefore invalid and illegal. Nonetheless, Petitioner fears that Respondents may attempt to transfer her from the Baltimore facility where she is presently detained to another state or jurisdiction, separating Petitioner from her counsel, her family and her community.

Petitioner intends to submit a detailed Memorandum of Law in support of this Emergency Motion, but has been unable to finalize that Memorandum of Law due to the urgency of the situation, as, upon information and belief, ICE may transfer her out-of-state at any time.

For these reasons, Petitioner asks this Court to provide immediate relief, enjoining Respondents from transferring Petitioner to any other facility, including but not limited to any out-of-state facility, and ordering Respondents to immediately release Petitioner from detention.

Respectfully Submitted.



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