

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

QUINCHI LOJA, Petitioner, v. FEDERAL DETENTION CENTER PHILADELPHIA, et al., Respondents.
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Case No. 2:26-cv-01518

Motion for Temporary
Restraining Order

MOTION FOR TEMPORARY RESTRAINING ORDER

Now comes the Petitioner, Dario Antonio Quinchi Loja, by and through his undersigned counsel, and hereby moves for a Temporary Restraining Order enjoining the Respondents from moving Petitioner outside the Commonwealth of Pennsylvania during the pendency of these proceedings. In support of this motion, Petitioner avers the following:

It is undersigned counsel's experience that Petitioner will likely be moved to a staging area such as Arizona or Louisiana, and then funneled to a detention center in such places as Mississippi, Colorado, Texas, or beyond. This movement disrupts the attorney/client working relationship and places even more undue stress on Petitioner's wife, daughter, and loved ones.

Further, Petitioner has been living peacefully in New Jersey for the past few years and in the New York/New Jersey area since his only entry in 2020. He has

established roots in the New Jersey community with his wife and six-year-old daughter. Petitioner has lived in New Jersey for about three years. He has worked a steady job in construction and paid taxes. Petitioner and his wife are parishioners at [REDACTED] in Hightstown, New Jersey, attend religious retreats, and have established roots in their community. Petitioner has never been arrested in the United States or anywhere in the world.

Petitioner being detained far afield in the United States, away from his child, wife, and immigration counsel, will cause irreparable harm to his ability to diligently prepare his applications for immigration relief. Undersigned counsel has experienced increasing difficult in scheduling remote virtual visits with detained clients repeatedly transferred to detention centers across the country. Detainees in various detention centers have less and less access to their legal counsel, ostensibly because detention centers do not have the resources to provide virtual visits or even phone calls to detainees trying to work with their attorneys.

We respectfully request this Honorable Court issue a Temporary Restraining Order enjoining Respondents from moving Petitioner outside the Commonwealth of Pennsylvania during the pendency of this proceeding.

Based on these signed documents and under the Federal Rule of Civil Procedure 65 and the Local Rule of Civil Procedure 65.1, the Petitioner respectfully requests a Temporary Restraining Order in support his Petition for Writ of Habeas Corpus.

Dated: March 9, 2026

Respectfully submitted,

/s/Pretty S. Martinez

Pretty S. Martinez

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FEDERAL DETENTION CENTER
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Temporary Restraining Order

After reviewing the Motion for Temporary Restraining Order preventing Respondents from moving Petitioner Dario Antonio Quinchi Loja outside the Commonwealth of Pennsylvania during the pendency of this proceeding, it is hereby ordered as follows:

The Motion is hereby granted.

IT IS SO ORDERED.

Dated:

U.S.D.J.