

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

Sandra ACOSTSA DE)	CASE NO. 1:26-cv-
MATA)	
Petitioner,)	VERIFIED PETITION FOR WRIT
)	OF HABEAS CORPUS UNDER 28
vs.)	U.S.C. § 2241 AND COMPLAINT
)	FOR INJUNCTIVE AND
)	DECLARATORY RELIEF
KRISTEN SULLIVAN,)	
Director, Atlanta ICE Field)	
Office)	
TODD LYONS, Director,)	
Immigration Customs)	
Enforcement;)	
MARKWAYNE MULLIN,)	
Secretary)	
Department of Homeland)	
Security;)	
PAMELA BONDI, Attorney)	
General;)	

Respondents.

MOTION FOR TEMPORARY RESTRAINING ORDER

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's case outside the jurisdiction of the Northern District of Georgia pending final resolution of this case and directing Respondents not to transfer Petitioner outside the state of Georgia

pending a final resolution of this case. Petitioner has an ICE check-in on Wednesday, April 8, 2026 at which time she is likely to be arrested.

Petitioner resides in the Northern District of Georgia. Respondents Markwayne Mullin, Todd Lyons, Kristen Sullivan and Pamela Bondi have the ability to transfer her to any detention center in ICE's vast network, removing her from her two children, one of whom is a US citizen and the other of whom has Deferred Action for Childhood Arrivals, and her counsel. She asks that she remain here in her community, where she has resided since 2003 pending the adjudication of her writ of habeas corpus.

Petitioner further moves that the order direct Respondents not to impose conditions of release on the Petitioner, such as GPS monitoring, that would constitute *de facto* custody and not to confiscate and / or retain her valid state-issued driver's license and valid employment authorization document.

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 6th Day of April, 2026.

A handwritten signature in black ink, appearing to read "Rachel Effron Sharma", with a long horizontal flourish extending to the right.

Rachel Effron Sharma
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