

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

FILED
APR 22 2026
MD-66-CDL

WILLIAM SANCHEZ REYES,
Petitioner,

v.

Civil Action No. _____

JASON STREEVAL, Warden, Stewart Detention
Center; MARKWAYNE MULLIN, Secretary of
Homeland Security; and TODD BLANCHE, Acting
Attorney General of the United States,
Respondents.

**EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION WITH EMBEDDED DECLARATION**

Petitioner William Sanchez Reyes, proceeding pro se, respectfully moves this Court pursuant to Federal Rule of Civil Procedure 65(b) for an Emergency Temporary Restraining Order ("TRO") and Preliminary Injunction: (1) prohibiting Respondents from removing Petitioner from the United States pending resolution of the Petition for Writ of Habeas Corpus; and (2) ordering his immediate release or, in the alternative, an individualized bond hearing within 48 hours.

I. LEGAL STANDARD

To obtain a TRO or preliminary injunction, a movant must demonstrate: (1) likelihood of success on the merits; (2) likelihood of irreparable harm in the absence of preliminary relief; (3) that the balance of equities tips in the movant's favor; and (4) that an injunction is in the public interest. *Winter v. Natural Resources Defense Council*, 555 U.S. 7, 20 (2008). The Eleventh Circuit also recognizes a sliding scale approach where a strong showing on one factor may compensate for a weaker showing on another. See *Garcia-Mir v. Meese*, 781 F.2d 1450 (11th Cir. 1986).

II. ARGUMENT

A. Likelihood of Success on the Merits

Petitioner is likely to succeed on his constitutional claims for the reasons set forth in the Petition. He was arrested on a minor traffic charge, paid bond the same day, and was seized by ICE before he could walk free—without a warrant or legal authorization. He is held without any individualized hearing at which the government bore the burden to justify detention. He has a U.S. citizen son, years of church community ties, and an impending immigration court hearing. The constitutional defects in his detention are clear and substantial.

B. Irreparable Harm

Deprivation of liberty constitutes irreparable harm per se. See *Ramirez v. Decker*, 2020 WL 2079523 (S.D.N.Y. Apr. 30, 2020). Additionally, if Petitioner is removed from the United States before this Court rules, the Court's jurisdiction will be mooted, and Petitioner will suffer the irreversible harm of removal without due process. *Nken v. Holder*, 556 U.S. 418 (2009). His immigration hearing is April 23, 2026—only nine days from the date of filing.

C. Balance of Equities

The balance of equities favors Petitioner overwhelmingly. He is a father of a United States citizen son. He has no criminal history involving violence. He has been a church community member for over seven years. He demonstrated no flight risk by posting state bond the same day of arrest. The government suffers no cognizable harm from maintaining the status quo while this Court adjudicates a constitutional question of the first order.

D. Public Interest

The public has a compelling interest in ensuring that executive detention complies with constitutional guarantees. Habeas corpus exists precisely to check unlawful executive detention. *Boumediene v. Bush*, 553 U.S. 723 (2008). Maintaining that check is unquestionably in the public interest.

III. NO BOND REQUIRED

Given Petitioner's detention and indigency, and the constitutional nature of the claims, the Court may waive any bond requirement. See *Leboeuf, Lamb, Greene & MacRae, LLP v. Worsham*, 185 F.3d 61, 67 (2d Cir. 1999).

For all foregoing reasons, Petitioner respectfully requests immediate issuance of the Temporary Restraining Order and setting of a hearing on the Preliminary Injunction.

Respectfully submitted this April 14, 2026,

William Sanchez Reyes, Pro Se

A. 

Stewart Detention Center

146 CCA Road

Lumpkin, GA 31815

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Respondents.

**DECLARATION OF WILLIAM SANCHEZ REYES
IN SUPPORT OF EMERGENCY MOTION FOR TEMPORARY RESTRAINING
ORDER**

I, William Sanchez Reyes, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge:

1. I am the Petitioner in this action. I am currently detained at Stewart Detention Center, 146 CCA Road, Lumpkin, Georgia 31815. My Alien Registration Number is A- I was born on , in Las Choapas, Veracruz, Mexico. I hold Mexican passport number .

2. On the morning of April 5, 2026, at approximately 6:00 to 7:00 a.m., local police in Columbia County, Georgia, stopped and arrested me for driving without a valid driver's license. I was taken to the Columbia County Jail. This was not a violent or criminal charge.

3. Later that same day, a state bond of \$1,100.00 was paid on my behalf. I was told I was to be released. I have a receipt confirming the payment (Fines & Fees No. 25211, Case No. 26-

004771). Before I could leave the facility, ICE agents took me into custody. No warrant was shown to me. No one told me I had a final order of removal against me.

4. On the morning of Monday, April 6, 2026, ICE transported me from Columbia County Jail to an ICE facility in the Atlanta, Georgia area. On approximately Thursday, April 9 or 10, 2026, I was transferred again to Stewart Detention Center in Lumpkin, Georgia, where I remain to this day.

5. I have not been given a bond hearing before an immigration judge where the government had to prove I am a danger to the community or a flight risk. No immigration judge has considered my family ties or community ties at a hearing where the government bore the burden of proof.

6. I am the father of Tony Williams Sanchez, a United States citizen, born on [REDACTED] 2005, in Augusta, Georgia. His Georgia birth certificate (State File No. [REDACTED]) lists me as his father. He holds a valid United States passport (No. [REDACTED]). He is 20 years old and lives in Georgia. My detention causes severe hardship to him.

7. I have lived in the Augusta, Georgia area for many years. I have been a registered and active member of Our Lady of Peace Catholic Church, 139 Way of Peace, North Augusta, South Carolina 29841, since at least October 2018. The church administrator, Rev. John Antonydas Gaspar, wrote a letter dated October 14, 2025, confirming that I am a parishioner in good standing.

8. I have a Master Calendar Hearing scheduled for April 23, 2026, at 1:00 p.m., before Immigration Judge Bianca H. Brown, via WebEx (<https://eoir.webex.com/meet/IJ.BiancaBrown>). Being detained at a remote facility, without a lawyer and far from my family and documents, makes it very difficult for me to prepare for this hearing.

9. I have no history of violence. I pose no danger to anyone. I am not a flight risk—I paid bond the same day I was arrested. I simply want to attend my immigration court hearing and be with my son.

10. If I am removed from the United States before this Court rules on my Petition, I will permanently lose the opportunity to have my constitutional claims adjudicated, and I will be separated from my U.S. citizen son without due process.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on April 14, 2026 at Lumpkin, Georgia.



William Sanchez Reyes

Declarant

CERTIFICATE OF SERVICE

I, William Sanchez Reyes, hereby certify that on April 14, 2026, I caused a true and correct copy of the Emergency Motion for Temporary Restraining Order and Declaration to be served upon the following parties by depositing the same in the United States mail, first-class postage prepaid, addressed as follows:

1. Jason Streeval, Warden, Stewart Detention Center, 146 CCA Road, Lumpkin, GA 31815
2. Markwayne Mullin, Secretary of Homeland Security, 2707 Martin Luther King Jr. Ave., SE, Washington, DC 20528

3. Todd Blanche, Acting Attorney General, 950 Pennsylvania Avenue, NW, Washington, DC 20530-0001

4. Civil Process Clerk, U.S. Attorney's Office, Middle District of Georgia, 300 Mulberry Street, Suite 400, Macon, GA 31201

Executed on April 14, 2026 at Lumpkin, Georgia.



William Sanchez Reyes, Pro Se

A 

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