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UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF GEORGIA COLUMBUS DIVISION

YEAN MARCOS SOTO LUGO,
Petitioner,

v.

WARDEN, STEWART DETENTION CENTER, et al.,
Respondents.

EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER (TRO)

Petitioner, through his Next Friend, respectfully moves this Honorable Court for the immediate issuance of a Temporary Restraining Order ("TRO") to prevent irreparable harm, unlawful transfer, removal, or retaliation while his Habeas Petition is pending.

I. EMERGENCY RELIEF REQUIRED

Petitioner faces an imminent risk of transfer, deportation, or retaliatory punishment, including placement in isolation or denial of basic necessities. These actions would irreparably harm Petitioner and undermine this Court's jurisdiction.

II. FACTUAL BASIS

Petitioner was detained on December 4, 2025, after voluntarily appearing for an ICE check-in. He has complied fully with all immigration requirements and maintains a pending asylum claim.

He has been subjected to:

- Denial of adequate food and exposure to spoiled meals
- Denial of medical care
- Verbal abuse with racial and xenophobic elements
- Psychological harm including depression and anxiety
- Significant weight loss and declining health

Petitioner also has a credible fear of:

- Immediate or sudden deportation without notice
- Transfer to another jurisdiction to defeat this Court's authority
- Retaliation for filing legal actions

III. LEGAL STANDARD

A TRO is warranted where:

1. Petitioner is likely to succeed on the merits;
2. Petitioner will suffer irreparable harm without relief;
3. The balance of equities favors Petitioner;
4. Relief is in the public interest.

See *Winter v. Natural Resources Defense Council*, 555 U.S. 7 (2008).

IV. ARGUMENT

A. LIKELIHOOD OF SUCCESS

Petitioner's detention violates due process under the Fifth Amendment and is not justified by any lawful purpose.

B. IRREPARABLE HARM

Deportation or transfer would permanently deprive Petitioner of judicial review and cause irreversible harm.

C. BALANCE OF EQUITIES

The harm to Petitioner outweighs any administrative burden on Respondents.

D. PUBLIC INTEREST

Ensuring constitutional protections and judicial oversight is of paramount importance.

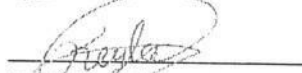
V. REQUEST FOR RELIEF

Petitioner respectfully requests that this Court:

1. Issue a Temporary Restraining Order immediately;
2. Prohibit Respondents from transferring Petitioner outside this jurisdiction;
3. Prohibit Respondents from removing Petitioner from the United States;
4. Prohibit Respondents from placing Petitioner in segregation or retaliation;

5. Order that Petitioner remain within the jurisdiction of this Court;
6. Grant any additional relief deemed just and proper.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Keyla', is written over a horizontal line.

Keyla Genao Castillo
Next Friend