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**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

JUAN JOSE CHIMBO-MOROCHO,

Petitioner,

v.

MARKWAYNE MULLIN, in his official capacity)
As Secretary of the Department of Homeland)
Security; **TODD BLANCHE**, in her official)
capacity as Attorney General of the United)
States; **TODD LYONS**, in his official)
capacity as Acting Director and Senior)
Official Performing the Duties of the)
Director of U.S. Immigration and Customs)
Enforcement; **JOHN DOE**, in her)
official capacity as Field Office)
Director of the Orlando Field Office)
of U.S. Immigration and Customs Enforcement,)
Enforcement and Removal Operations;)
JOHN DOE, in his official capacity)
as Warden of the Baker County Detention)
Center.,)

Respondents.

Case No. _____

**MOTION FOR TEMPORARY
RESTRAINING ORDER**

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INTRODUCTION

Petitioner Juan Jose Chimbo-Morocho is a 38-year-old Ecuadorian citizen and national. He entered the United States on or about May 23, 2024, without admission or parole, and has pursued protection through the immigration process by filing an application for asylum, withholding of removal, and protection under the Convention Against Torture. There is no evidence before this Court establishing that Petitioner has any confirmed criminal convictions or a history of violence.

Despite these equities, on or about January 19, 2026, Immigration and Customs Enforcement (“ICE”) took Petitioner into DHS custody following his arrest by local authorities in Kissimmee, Florida, and he has remained detained since that date. Petitioner is currently detained under pre-final order detention authority while his removal proceedings remain pending.

However, Petitioner has been effectively denied access to any bond hearing or individualized custody determination, as no Immigration Judge has conducted any custody review in his case. As a result, no adjudicator has evaluated whether Petitioner poses a danger to the community or a risk of flight.

As a direct result of the absence of any custody review mechanism, Petitioner has been denied the individualized custody review guaranteed to him under the Immigration and Nationality Act and the Due Process Clause of the Fifth Amendment. His detention—civil in name yet punitive in effect—has become arbitrary and indefinite, without any individualized finding of danger or flight risk.

Petitioner is likely to succeed on the merits of his habeas claims because DHS’s continued detention of Petitioner without any mechanism for individualized custody review violates the

Immigration and Nationality Act, exceeds the agency's statutory authority, and deprives Petitioner of fundamental constitutional protections governing civil detention. Without immediate judicial intervention, Petitioner will continue to suffer irreparable harm, as he remains confined for an indefinite period without any meaningful opportunity to challenge the legality of his detention.

For these reasons, Petitioner respectfully requests that this Court: (1) enjoin Respondents from transferring him outside this District while this action is pending; (2) direct Respondents to provide him a constitutionally adequate custody determination within seven (7) days, before a neutral decisionmaker with authority to grant release, at which DHS bears the burden of proving by clear and convincing evidence that continued detention is warranted; and (3) grant such other and further relief as law and justice require.

STATEMENT OF FACTS

Petitioner repeats and incorporates by reference each Statement of Facts contained in the Petition for *Writ of Habeas Corpus* as if fully set forth herein.

I. HABEAS RELIEF

To obtain habeas corpus relief, a petitioner must demonstrate that he is "in custody in violation of the Constitution or laws or treaties of the United States." *See* 28 U.S.C. § 2241(c)(3). This Court has *habeas corpus* jurisdiction to consider the statutory and constitutional grounds for immigration detention that are unrelated to a final order of removal. *See Demore v. Kim*, 538 U.S. 510, 517-18 (2003).

II. DETENTION AUTHORITY UNDER THE INA

The Immigration and Nationality Act ("INA") establishes three principal statutory bases

for the detention of noncitizens in removal proceedings. First, 8 U.S.C. § 1226(a) authorizes the discretionary detention of noncitizens placed in standard removal proceedings under 8 U.S.C. § 1229a. Individuals detained under § 1226(a) are entitled to an individualized custody determination before an Immigration Judge and may seek release on bond or conditional parole. See 8 C.F.R. §§ 1003.19(a), 1236.1(d). By contrast, noncitizens falling within certain enumerated criminal categories are subject to mandatory detention under § 1226(c).

Second, the INA authorizes mandatory detention of certain arriving or recently arrived noncitizens placed in expedited removal or other admission-related proceedings under 8 U.S.C. § 1225(b). Individuals encountered at or near the border are deemed “applicants for admission,” 8 U.S.C. § 1225(a)(1), and must demonstrate that they are “clearly and beyond a doubt” entitled to be admitted. *Id.* § 1225(b)(2)(A). Those who cannot make such a showing “shall be detained” pending resolution of their cases, unless temporarily paroled under § 1182(d)(5)(A).

Third, individuals subject to a final order of removal fall under the post-order detention scheme set forth in 8 U.S.C. § 1231(a)–(b), which authorizes detention only for a period reasonably necessary to effectuate removal. Sections 1226(a) and 1225(b)(2) were enacted through the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (“IIRIRA”), while § 1226(c) was most recently amended by the Laken Riley Act in 2025.

Under this statutory framework, Petitioner’s custody arises under pre-final order detention authority while his removal proceedings under § 240 remain pending. He is in standard § 240 removal proceedings before the Orlando Immigration Court, has no confirmed criminal convictions in the current record, and is not subject to any final order of removal. DHS exercised its discretionary arrest authority and placed Petitioner into civil immigration detention. Regardless of the statutory classification asserted by DHS, nothing in the INA authorizes prolonged or

indefinite detention without any individualized custody determination. Nothing in the INA authorizes prolonged or indefinite detention of a noncitizen who poses no danger or flight risk; civil detention must remain reasonably related to the government's limited purposes of ensuring appearance and protecting public safety. See *Jennings v. Rodriguez*, 138 S. Ct. 830 (2018); *Demore v. Kim*, 538 U.S. 510, 528–31 (2003).

Despite this statutory scheme, DHS has invoked the Board of Immigration Appeals' decision in *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025) to argue that Immigration Judges lack jurisdiction to conduct bond hearings for individuals who DHS asserts were apprehended "shortly after entry." Relying on that interpretation, the Immigration Judge denied jurisdiction to consider Petitioner's bond request, despite his placement in § 240 proceedings, his eligibility for custody redetermination under 8 C.F.R. §§ 1003.19(a), 1236.1(d).

This position effectively deprives Petitioner—and similarly situated individuals—of the statutory and regulatory protections that Congress and the Executive have long provided to noncitizens in § 240 proceedings. It results in prolonged detention with no individualized assessment of necessity, contrary to the INA's structure and purpose and inconsistent with constitutional limits on civil confinement.

Accordingly, Petitioner's continued detention falls outside the narrow detention authority conferred by the INA, which requires individualized custody review and prohibits arbitrary or indefinite detention—protections that Petitioner has been categorically denied.

STANDARD OF REVIEW

Temporary restraining orders and preliminary injunctions are evaluated under the same standard in the Ninth Circuit. Under the framework established by the Supreme Court in *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 20 (2008), a movant must demonstrate a

likelihood of success on the merits, a likelihood of suffering irreparable harm in the absence of preliminary relief, that the balance of equities tips in the movant's favor, and that an injunction is in the public interest. The Ninth Circuit also recognizes a complementary "sliding scale" approach under which a movant may obtain relief by raising serious questions going to the merits and demonstrating that the balance of hardships tips sharply in his favor, so long as the remaining *Winter* factors are met. *Alliance for the Wild Rockies v. Cottrell*, 632 F.3d 1127, 1134–35 (9th Cir. 2011). A TRO is warranted where, as here, the petitioner faces ongoing constitutional violations and unlawful detention that threaten immediate, irreparable injury for which no adequate remedy exists at law.

ARGUMENTS

I. PETITIONER HAS ESTABLISHED A LIKELIHOOD OF SUCCESS ON THE STATUTORY DETENTION¹

A. Petitioner's Prolonged Detention Without a Bond Hearing Is Unlawful Under the INA

The Immigration and Nationality Act ("INA") authorizes civil immigration detention only when it serves a legitimate statutory purpose: ensuring appearance at future proceedings or protecting public safety. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001); *Clark v. Martinez*, 543 U.S. 371, 381 (2005). When detention ceases to advance those purposes or becomes arbitrary or indefinite, it exceeds the government's statutory authority.

¹ See, e.g., *Alvarez Ortiz v. Freden*, No. 25-CV-960, *Ortiz v. Freden*, 2025 U.S. Dist. LEXIS 217654 (W.D.N.Y. Nov. 4, 2025) (granting temporary restraining order and requiring bond hearing within seven days); *Padron Covarrubias v. Vergara*, No. 5:25-CV-112, *Hernandez Capote v. Sec'y of United States Dep't of Homeland Sec.*, 2025 U.S. Dist. LEXIS 218136 (S.D. Tex. Oct. 8, 2025) (granting habeas relief under 8 USCS § 1226 and ordering a prompt bond hearing or release by a fixed deadline); *Guerrero Orellana v. Moniz*, No. 25-CV-12664, *Orellana v. Moniz*, 2025 U.S. Dist. LEXIS 196282 (D. Mass. Oct. 3, 2025) (holding that petitioner's detention is governed by § 1226(a) and enjoining continued custody without a bond hearing); *Lepe v. Andrews*, No. 1:25-CV-01163, *Lepe v. Andrews*, 2025 U.S. Dist. LEXIS 187233 (E.D. Cal. Sept. 23, 2025) (same).

Petitioner has now been detained for approximately several months without any individualized determination regarding the necessity of his confinement. He was taken into ICE custody pursuant to DHS's discretionary arrest authority and placed in removal proceedings under § 240, yet has not been provided any custody redetermination hearing or individualized assessment of his detention. Petitioner does not have any confirmed criminal convictions in the current record, there is no evidence before this Court establishing that he poses a danger to the community or a risk of flight, and he has pursued relief through the immigration process. Despite these facts, no custody redetermination has been made available, and he remains confined at the Baker County Detention Center, Macclenny, Florida, without any individualized custody assessment.

Courts have repeatedly held that prolonged civil detention without an individualized bond hearing violates both the INA and the Due Process Clause. See *Hernandez v. Sessions*, 872 F.3d 976, 991 (9th Cir. 2017) (requiring individualized assessments for prolonged detainees); see also *Sajous v. Decker*, 2018 WL 2357266, at *11 (S.D.N.Y. May 23, 2018) (holding detention unreasonable where government failed to justify continued confinement). Because Petitioner's detention no longer serves any legitimate governmental interest, it has become arbitrary, excessive, and unlawful under the INA.

B. DHS's Reliance on a Jurisdictional Technicality Has Deprived Petitioner of a Custody Review Mechanism.

DHS asserts that Petitioner is subject to mandatory detention under § 1225(b) of the INA based on disputed allegations that he was apprehended "shortly after entry." The government's own actions contradict that assertion. Petitioner was placed in § 240 removal proceedings governed by § 1226(a). Under these circumstances, jurisdiction over the bond lies with the Immigration Judge. See 8 C.F.R. §§ 1003.19(a), 1236.1(d).

Although Petitioner may seek bond redetermination under existing procedures, such efforts are futile due to current immigration policies and precedents, including the Immigration Court's lack of jurisdiction for meaningful custody review under *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025). These policies impose blanket restrictions, preclude individualized assessments, and ignore case-specific changes, rendering any redetermination illusory and likely to be denied without substantive consideration. Consequently, Petitioner remains in indefinite detention without a genuine opportunity for release, violating procedural due process and highlighting systemic flaws for similarly situated individuals.

This bureaucratic reclassification has placed Petitioner in administrative limbo: he is treated as an “arriving alien” for detention purposes but as a § 240 respondent for removal purposes. The statute does not authorize DHS to deny him access to a custody review process by manipulating jurisdictional labels. This misclassification is contrary to the INA, the governing regulations, and established precedent requiring individualized assessments of custody.

C. Continued Detention Violates Petitioner’s Fifth Amendment Right to Due Process.

The Fifth Amendment guarantees that no person shall be deprived of liberty without due process of law, a protection that extends to all persons within the United States regardless of immigration status. *Zadvydas*, 533 U.S. at 693; *Landon v. Plasencia*, 459 U.S. 21, 32 (1982). Petitioner’s prolonged detention—without any custody redetermination hearing, without individualized assessment, and following the Immigration Judge’s express denial of jurisdiction to consider bond on October 15, 2025—violates these core constitutional protections.

The Supreme Court has emphasized that “[f]reedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty

that [the Due Process] Clause protects.” *Zadvydas*, 533 U.S. at 690 (quoting *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992)). Applying the three-part balancing test of *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976), Petitioner’s due process claim easily prevails.

First, the private interest at stake—freedom from physical confinement—is one of the most fundamental recognized in constitutional law; even more so, when the deprivation of liberty occurs outside the authority of the law.

Second, the risk of erroneous deprivation is extraordinarily high given the complete absence of any individualized custody determination or neutral adjudicative review of Petitioner’s detention.

Third, the government’s interest in maintaining custody is minimal here, as there is no evidence in the current record establishing that Petitioner poses a danger or flight risk.. Because the government has provided no constitutionally adequate procedure to review the lawfulness or necessity of Petitioner’s detention, his continued confinement violates the Due Process Clause. At a minimum, due process requires a prompt bond hearing before a neutral adjudicator at which DHS bears the burden of establishing, by clear and convincing evidence, that continued detention is necessary.

II. PETITIONER WILL SUFFER IRREPARABLE HARM UNLESS THE COURT ISSUES A TEMPORARY RESTRAINING ORDER

Under *Winter v. Natural Resources Defense Council*, 555 U.S. 7 (2008), Petitioner must demonstrate that he will suffer irreparable harm in the absence of immediate injunctive relief. In the immigration detention context, courts have consistently recognized that ongoing, unlawful deprivation of physical liberty constitutes irreparable harm as a matter of law. See *Rodriguez v. Robbins*, 804 F.3d 1060, 1080–81 (9th Cir. 2015), rev’d on other grounds sub nom. *Jennings v.*

Rodriguez, 138 S. Ct. 830 (2018); *R.I.L.-R v. Johnson*, 80 F. Supp. 3d 164, 191 (D.D.C. 2015) (“the deprivation of physical liberty for even one day constitutes irreparable harm”). Petitioner’s continued confinement— without any bond hearing or individualized custody determination— inflicts exactly the sort of harm that the Winter standard contemplates.

Petitioner has been detained since on or about January 19, 2026, at the Baker County Detention Center in Macclenny, Florida, a secure civil detention facility whose conditions closely resemble those of a penal institution. He is deprived of freedom of movement, placed under strict institutional control, separated from his family and community support network, and subjected to continuous monitoring. Every additional day of confinement deepens the constitutional injury he suffers from being denied access to a bond hearing or any meaningful opportunity to challenge the legality of his detention.

Courts have recognized that “[p]rolonged detention without an individualized determination of dangerousness or flight risk inflicts irreparable injury on detainees.” *Sajous v. Decker*, 2018 WL 2357266, at *12 (S.D.N.Y. May 23, 2018). The harm here is neither hypothetical nor remote; it is ongoing, acute, and directly attributable to Respondents’ refusal to provide Petitioner with a custody determination. See also *Leal-Hernandez v. Noem*, No. 1:25-cv-02428, 2025 WL 327685, at *37 (D. Md. Aug. 24, 2025) (finding irreparable harm where petitioner remained detained without any lawful process or review).

Petitioner’s continued incarceration has also caused significant emotional and psychological harm. His continued detention under conditions of uncertainty and confinement has resulted in significant emotional distress, including anxiety, stress, and fear associated with prolonged and indefinite detention. Such mental and emotional injuries cannot be undone after the

fact, nor can they be compensated monetarily. The Ninth Circuit has recognized that “every day of detention is another day of lost liberty that cannot be recovered.” *Hernandez v. Sessions*, 872 F.3d 976, 994 (9th Cir. 2017).

The public interest likewise favors immediate intervention. Preventing constitutional violations is always in the public interest. *Melendres v. Arpaio*, 695 F.3d 990, 1002 (9th Cir. 2012). Allowing DHS to continue detaining Petitioner indefinitely without lawful authority or individualized review undermines the integrity of the immigration system and erodes public confidence in the rule of law.

Accordingly, Petitioner has demonstrated irreparable harm of the highest order. Immediate judicial intervention is necessary to prevent further unlawful deprivation of liberty and to ensure compliance with the statutory and constitutional safeguards governing civil detention.

III. THE BALANCE OF HARMS WEIGHS IN FAVOR OF PETITIONER

The final two *Winter* factors—the balance of equities and the public interest—strongly favor granting injunctive relief. Where the government is a party, these factors merge. *Nken v. Holder*, 556 U.S. 418, 435 (2009). Together, they require the Court to consider whether the harm to Petitioner from continued detention outweighs any harm to the government arising from his release or from providing a prompt bond hearing, and whether such relief advances or undermines the public interest.

Here, the equities tilt sharply in Petitioner’s favor. Every additional day of confinement inflicts a profound deprivation of liberty. It exacerbates the psychological and emotional harm that Petitioner has already suffered during his incarceration at the Baker County Detention Center in Macclenny, Florida. Petitioner does not have any confirmed criminal convictions in the current

record, there is no evidence before this Court establishing that he poses a danger to the community or a risk of flight, and he has pursued relief through the immigration process. His continued detention serves no legitimate purpose under the Immigration and Nationality Act (“INA”). It directly contradicts the government’s stated interest in detaining only those who present a genuine risk of flight or a threat to public safety.

By contrast, the government faces minimal—if any—harm if relief is granted. Releasing Petitioner under reasonable supervision or providing him with a constitutionally adequate bond hearing does not impede any lawful enforcement objective. As courts have observed, “[t]he government suffers no harm when it is required to adhere to the Constitution.” *O’Donnell v. Harris County*, 892 F.3d 147, 155 (5th Cir. 2018). Administrative convenience cannot justify prolonged, unlawful detention that exceeds statutory authority or violates constitutional protections.

The public interest also strongly favors Petitioner. The public has an overriding interest in ensuring that immigration detention is conducted lawfully, in accordance with due process, and only for legitimate statutory purposes. See *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001) (warning that indefinite civil detention “would raise serious constitutional concerns”); *Beltran v. Smith*, 458 F. Supp. 3d 1139, 1145 (D. Colo. 2020) (ordering release where detention no longer served INA objectives). Upholding constitutional safeguards for individuals in civil immigration custody reinforces the integrity of the justice system and affirms that the government must operate within the bounds of law and necessity.

Balancing these considerations, both the equities and the public interest weigh decisively in favor of Petitioner’s release or, at minimum, a prompt bond hearing before a neutral adjudicator. Granting relief will prevent further irreparable harm to Petitioner and promote the public’s

compelling interest in ensuring that the government complies with statutory and constitutional constraints governing civil detention.

CONCLUSION

For the reasons set forth above, Petitioner Juan Jose Chimbo-Morocho has demonstrated a clear likelihood of success on the merits of his claims, will suffer irreparable harm in the absence of immediate relief, and has shown that the balance of equities and the public interest overwhelmingly favor granting a temporary restraining order. His continued detention—without any bond hearing or individualized custody determination, and without any meaningful mechanism to challenge the legality of his confinement—violates the Immigration and Nationality Act, the Due Process Clause of the Fifth Amendment, and the *Accardi* doctrine.

Accordingly, Petitioner respectfully requests that this Honorable Court:

1. Enjoin Respondents and their agents from transferring Petitioner outside the jurisdiction of this Court while this matter is pending;
2. Direct Respondents to provide him with a constitutionally adequate bond hearing before a neutral Immigration Judge within three (3) days, at which the government bears the burden of proving, by clear and convincing evidence, that continued detention is necessary; and
3. Grant such other and further relief as the Court deems just and proper.

Dated: April 23, 2026

Respectfully Submitted,

/s/ Maria Bueno

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VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I represent Petitioner, JUAN JOSÉ CHIMBO-MOROCHO, and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Temporary Restraining Order are true and correct to the best of my knowledge.

Dated: April 23, 2026

/s/ Maria Bueno
Mariah Bueno

CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2026, I filed the foregoing petition for Temporary Restraining Order electronically through the CM/ECF system, which caused all parties or counsel to be served by electronic means as more fully reflected on the Notice of Electronic Filing.

Dated: April 23, 2026

/s/ Maria Bueno
Mariah Bueno