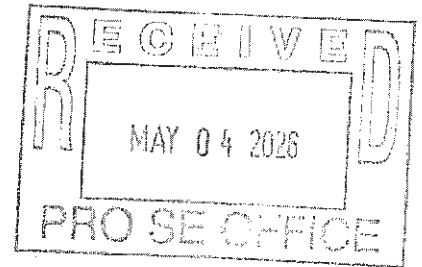


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK



MAMADOU SAIDOU DIALLO, Pro Se

Petitioner,

Civil Action No. 26-cv-1194-BMC

-against-

WARDEN, Metropolitan Detention Center (Brooklyn), et al.,

COGAN, J

Respondents.

APPLICATION FOR TEMPORARY RESTRAINING ORDER

Petitioner Mamadou Saidou Diallo respectfully applies for a Temporary Restraining Order pursuant to Rule 65, for the reasons set forth in the accompanying memorandum of law and Verified Petition.

Petitioner seeks an order prohibiting Respondents from transferring him outside the Eastern District of New York pending resolution of this habeas action.

1. Petitioner is currently detained at the Metropolitan Detention Center in Brooklyn.
2. Petitioner has been detained for more than six months without any custody determination.
3. Petitioner remains detained without any adjudication that his detention is necessary.
4. Petitioner's habeas petition challenges the legality of that detention.
5. Absent relief, Respondents may transfer Petitioner outside this District at any time.
6. Transfer would impair Petitioner's access to counsel and the Court.
7. Transfer would risk frustrating this Court's jurisdiction over Petitioner's habeas claims.
8. Temporary injunctive relief is necessary to preserve the status quo.

WHEREFORE, Petitioner respectfully requests that this Court:

- A. Issue a Temporary Restraining Order prohibiting Respondents from transferring Petitioner outside the Eastern District of New York; and
- B. Grant such other relief as the Court deems appropriate.

Dated: May 1, 2026
Brooklyn, New York

Respectfully submitted,



Mamadou Saidou Diallo
Petitioner

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

MAMADOU SAIDOU DIALLO, Pro Se

Petitioner,

Civil Action No. _____

-against-

WARDEN, Metropolitan Detention Center (Brooklyn), et al.,

Respondents.

**MEMORANDUM OF LAW IN SUPPORT OF APPLICATION FOR
TEMPORARY RESTRAINING ORDER**

I. INTRODUCTION

Petitioner seeks a temporary restraining order to preserve this Court's jurisdiction while his habeas petition is adjudicated. Petitioner has been detained for more than six months without any adjudication that his detention is necessary. No decisionmaker has evaluated whether his detention is warranted. In the absence of such adjudication, Petitioner's continued detention is unlawful. Without interim relief, Respondents may transfer Petitioner outside this District, impairing his access to counsel and risking the effective loss of this Court's jurisdiction.

II. LEGAL STANDARD

A temporary restraining order may issue where the movant demonstrates likelihood of success on the merits, irreparable harm, favorable equities, and consistency with the public interest.

III. LIKELIHOOD OF SUCCESS

Petitioner is likely to succeed because his detention is proceeding without any adjudication. No Immigration Judge has determined that Petitioner poses a danger or a risk of flight. No evidentiary record supports continued detention. Prolonged detention without a meaningful opportunity to be heard violates due process.

IV. IRREPARABLE HARM

The loss of physical liberty constitutes irreparable harm. Petitioner has already been detained for months without adjudication. Each additional day compounds that harm. Transfer outside the

District would risk frustrating this Court's jurisdiction and impair Petitioner's ability to pursue this action.

V. BALANCE OF EQUITIES

The balance of equities strongly favors Petitioner. Petitioner seeks only to preserve the status quo and prevent further unlawful detention. Respondents have no legitimate interest in transferring Petitioner or maintaining detention without adjudication.

VI. PUBLIC INTEREST

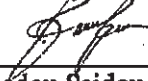
The public interest is served by ensuring that detention complies with statutory and constitutional limits.

VII. CONCLUSION

Petitioner remains detained without any adjudication that his detention is necessary. Under these circumstances, temporary injunctive relief is warranted.

Dated: May 1, 2026
Brooklyn, New York

Respectfully submitted,



Mamadou Saidou Diallo
Petitioner