

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

FREDY PASTRANA-BELTRAN,

Petitioner,

Civil Action No. _____

v.

ORAL ARGUMENT REQUESTED

MARKWAYNE MULLIN, in his official capacity as
Secretary of the U.S. Department of Homeland
Security;

TODD LYONS, in his official capacity as Acting
Director of U.S. Immigration and Customs
Enforcement;

KENNETH GENALO, in his official capacity as
Field Office Director of Enforcement and Removal
Operations of the New York Office of U.S.
Immigration and Customs Enforcement;

TODD BLANCHE, in his official capacity as Acting
U.S. Attorney General; and

RAUL MALDONADO, Jr., in his official capacity
as Warden of the Metropolitan Detention Center;

Respondents.

**EXPEDITED HEARING
REQUESTED**

MOTION FOR A PRELIMINARY INJUNCTION

Petitioner-Plaintiff Fredy Pastrana-Beltran (“Mr. Pastrana-Beltran” or “Petitioner”) respectfully moves the Court for the entry of a preliminary injunction ordering his release, and restraining Respondents from detaining Mr. Pastrana-Beltran pending the Court’s final adjudication of his Petition. As detailed in the accompanying Memorandum of Law, all four relevant factors weigh heavily in favor of injunctive relief. Accordingly, Mr. Pastrana-Beltran asks the Court to order Respondents to promptly show cause why a preliminary injunction should not be issued.

Date: May 4, 2026

New York, New York

Respectfully submitted,

**AKIN GUMP STRAUSS HAUER &
FELD LLP**

By: /s/Amama Rasani

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