

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF GEORGIA  
VALDOSTA DIVISION**

**BRENDA GARRO SALAZAR,** )

**Petitioner,** )

**v.** )

Case No. \_\_\_\_\_

**TODD LYONS,** Acting Director of ICE; )

**WARDEN,** Irwin Detention Center; )

**KRISTEN SULLIVAN,** Acting ERO )

Director of Atlanta Field Office, )

U.S. Immigration and Customs Enforcement )

(“ICE”); **MARKWAYNE MULLIN,** )

Secretary of the U.S Department of )

Homeland Security; **TODD BLANCHE,** )

Attorney General of the United States; and )

**WILLIAM KEYES,** U.S. Attorney for the )

Middle District of Georgia, )

in their official capacities, )

**Respondents.** )

\_\_\_\_\_ )

**PETITIONER’S NOTICE AND EMERGENCY MOTION FOR  
TEMPORARY RESTRAINING ORDER**

COMES NOW, Brenda Garro Salazar, Petitioner in the above-styled and numbered cause, by and through the undersigned attorney of record, and for cause of action hereby files this notice and motion for a temporary restraining order

(“TRO”) pursuant to Federal Rule of Civil Procedure 65(b) to request immediate release of Petitioner and to enjoin Respondents from transferring Petitioner out of this District or deporting her during the pendency of the underlying proceedings. Petitioner has been informed of Respondent’s intention to transfer Petitioner to a detention center in Louisiana. *See Exhibit 1*, ICE Detainee Locator and *Exhibit 2*, Notice of Transfer.

Because Petitioner’s detention violates the Due Process Clause of the Fifth Amendment to the United States, Petitioner respectfully requests that this Court (1) order Petitioner’s immediate release from Respondents’ custody pending these proceedings, without requiring bond or electronic monitoring, or, in the alternative, (2) order Petitioner’s immediate release from Respondents’ custody and, within 14 days, order a pre-deprivation bond hearing before the Stewart Immigration Court, where Respondents shall bear the burden of proof to show, by clear and convincing evidence, that Petitioner is a danger or a flight risk. To preserve this Court’s jurisdiction, Petitioner further seeks an order enjoining Respondents from transferring Petitioner out of this District or deporting her during the pendency of the underlying proceedings.

This motion is based on this Notice of Motion and Motion; the accompanying Memorandum of Points and Authorities; the supporting declarations, the papers, evidence, and records on file in this action; and any other written or oral evidence or

argument as may be presented at or before the time this motion is heard by the Court. This motion is also supported by the Petition for Writ of Habeas Corpus (ECF No. 1).

Consistent with Fed. R. Civ. P. 65, Petitioners seeks relief at the earliest possible opportunity. Petitioner is filing this motion the same day he filed his Petition for Writ of Habeas Corpus.

Pursuant to Fed. R. Civ. P. 65(b)1(B), as of this filing, Respondents have not stipulated to a TRO.

Respectfully submitted,

This 4<sup>th</sup> day of May, 2026.

**COCHRAN IMMIGRATION**

/s/ Johanna Cochran  
by: Johanna Cochran  
Georgia Bar No. 611902  
*Attorney for the Petitioner*

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