

Carolina T. Curbelo, Esq.
The Law Office of Carolina T. Curbelo, LLC
41 North Broad Street, 2nd Floor
Ridgewood, NJ 07450
Telephone: (201) 379-4040
Fax: (201) 379-4777
Email: Carolina.Curbelo@curbelolaw.com
Attorney for Petitioner

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Isidro CABANAS-REYES,

Petitioner,

v.

Luis SOTO, Warden, Delaney Hall Detention
Facility, Todd LYONS, Acting Director, U.S.
Immigration and Customs; Markwayne
MULLIN, in his Official Capacity, Secretary,
U.S. Department of Homeland Security
(hereinafter "DHS"); Todd BLANCHE, the
Acting Attorney General of the United States of
America

Respondents.

Case No.: 26-5911

**MOTION FOR TEMPORARY
RESTRAINING ORDER**

MOTION FOR TEMPORARY RESTRAINING ORDER

PLEASE TAKE NOTICE that as soon as counsel may be heard, the undersigned will move the Court, seeking a Temporary Restraining Order ("TRO") in the form attached hereto and asking that this matter be set down for a hearing to convert those temporary restraints into a Preliminary Injunction pursuant to Fed. R. Civ. P. 65. In support of this motion, Petitioner submits the accompanying Memorandum of Law in Support of a Temporary Restraining Order and the concurrently filed Complaint.

WHEREFORE, Petitioner respectfully requests that this Court grant this Motion for a Temporary Restraining Order and issue an order (i) enjoining Respondents from moving him outside the U.S. District of New Jersey; (ii) enjoining Respondents from detaining Petitioner

under 8 U.S.C. § 1225(b)(2); and (iii) ordering Petitioner's immediate release from Respondents' custody.

Respectfully Submitted,

Date: May 23, 2026

s/Carolina T. Curbelo

Carolina T. Curbelo (NJ Bar 008892010)
The Law Office of Carolina T. Curbelo, LLC
41 N. Broad Street, 2nd Floor
Ridgewood, New Jersey 07450
Tel. (201) 379-4040
Carolina.Curbelo@curbelolaw.com
ATTORNEY FOR PETITIONER