UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

I.E.T.P., a minor, by and through Next Friend, A.R.T.P.,

Plaintiff-Petitioners,

v.

MARKWAYNE MULLIN, in his official capacity as Secretary of the U.S. Department of Homeland Security, TODD BLANCHE, in his official capacity as Acting Attorney General of the United States; ROBERT F. KENNEDY, JR. in his official capacity as Secretary of Health and Human Services; ANGIE SALAZAR, in her official capacity as Acting Director of the Office of Refugee Resettlement; MARIANA VALDEZ in her official capacity as Office of Refugee Resettlement Federal Field Specialist; JUSTINE CHRISTAKOS in her official capacity as Chief Executive Officer of Abbott House; U.S. Department of Homeland Security; U.S. Immigration and Customs Enforcement; U.S. Department of Health and Human Services; U.S. Office of Refugee Resettlement,

Defendant-Respondents.

Civil Case No.: 1:26-cv-06490

PLAINTIFF-PETITIONER'S EMERGENCY MOTION FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

Pursuant to Fed. R. Civ. P., Rule 65 (a) and (b), Plaintiff-Petitioner moves for a preliminary injunction, or in the alternative, a temporary restraining order, directing the Defendant-Respondents to release from their custody forthwith I.E.T.P, a 17-year old child, to the care of his brother A.R.T.P.

As detailed in the attached memorandum and in the Plaintiff-Petitioner's Petition for a Writ of Habeas Corpus and Complaint, I.E.T.P. has been in the custody of the Office of Refugee Resettlement ("ORR") for approximately 222 days. The Defendant-Respondents' prolonged detention and separation of this child from his biological brother violates his constitutional, statutory, and regulatory rights, constituting irreparable harm. Each day that I.E.T.P. remains in Defendants-Respondents' custody, he continued to suffer trauma and harm to his emotional, developmental, psychological, and education wellbeing, with significant relational and attachment consequences. And now, there is a looming threat that ORR will be moving all children, including I.E.T.P., from New York to Texas, farther away from the only family that I.E.T.P. knows.

WHEREFORE, the Plaintiff-Petitioner respectfully requests that the Court issue a preliminary injunction, or in the alternative, a temporary restraining order, ordering the Defendant-Respondents to release I.E.T.P. from detention immediately, without restraints on his liberty, and to place him in the custody of his brother, A.R.T.P.

Dated: July 29, 2026

Respectfully submitted,

/s/ Lauren Fouda
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