

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Jose Alberto Sanchez,

Plaintiff,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY;
Kristi NOEM, Secretary, U.S. Department of
Homeland Security, in her official capacity; Pamela
BONDI, U.S. Attorney General, in her official
capacity; and Johnny CHOATE, Warden of GEO
Group Aurora Inc., in his official capacity,

Defendants.

Case No. 1:25-cv-02287

**PLAINTIFF'S EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION AND STAY OF ADMINISTRATIVE ACTION**

Plaintiff respectfully requests that the Court grant his Emergency Motion for a Temporary Restraining Order and Preliminary Injunctive Relief. The grounds for this motion are set forth in the accompanying memorandum of law, exhibits in support thereof, and the applicable law.

This motion is being filed on July 31, 2025. The following dates are critical to the timing of adjudication of this motion. Plaintiff is currently in immigration custody in Aurora, Colorado at the GEO Detention Center and is at imminent risk of deportation to a third country. ICE Confirmed to Counsel via Email on July 24, 2025, that it is currently soliciting three alternate countries for removal.

Respectfully submitted this 31st day of July, 2025.

Respectfully submitted,

/s/ Lisa Guerra

LISA GUERRA, ESQ.

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CERTIFICATE OF SERVICE

I certify that on July 31, 2025, I filed the foregoing with the Clerk of the Court for the District of Colorado using the CM/ECF system. All Participants in the case are registered with the CM/ECF and will be served by the CM/ECF system.

Respectfully submitted,

/s/ Lisa Guerra

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