

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF KANSAS

ABRAHIM BUSH ABRAHIM MANAGO,

Petitioner,

v.

CRYSTAL CARTER, *et al.*,

Respondents.

Case No. 5:25-cv-03183-JWL

MOTION FOR TEMPORARY
RESTRAINING ORDER

COMES NOW Plaintiff Abraham Bush Abraham Manago, through counsel, and pursuant to Fed. R. Civ. P. 65 respectfully requests that this Court enter a temporary restraining order to preserve the status quo in this matter pending a hearing on his Verified Petition for Habeas Corpus (ECF No. 1).

Mr. Manago is a political refugee from Sudan who has been granted withholding of removal by an immigration judge, meaning he cannot legally be deported to Sudan. He has filed for habeas relief because Respondents have detained him for more than six months after the immigration judge's order became final and his detention has now become unconstitutionally prolonged under *Zadvydas v. Davis*, 533 U.S. 678 (2001).

As set forth in the accompanying Memorandum of Law, Mr. Sudan has reason to fear that, before this Court can determine the merits of his Petition, Respondents may try to hurriedly deport him to a random third country where his life or safety could be threatened, or that such third country (which would not be bound by the U.S. immigration court's order) would return him to Sudan, where he stands to face politically-motivated persecution and torture.

In support of this Motion, Mr. Manago relies upon the accompanying Memorandum and his Verified Petition. Mr. Manago respectfully requests the Court grant this motion and issue a temporary restraining order as soon as possible, to preserve the status quo and this Court's jurisdiction over his petition.

Dated: September 3, 2025

Respectfully submitted,

/s/ James D. Jenkins

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed via the Court's CM/ECF system this 3rd day of September, 2025, and that a true copy of the foregoing was served pursuant to Fed. R. Civ. P. 4(i) via certified United States mail, sent this 3rd day of September, 2025 to the Respondents at the following addresses, and a courtesy copy was sent via electronic mail to the U.S. Attorney's Office for the District of Kansas at russell.keller@usdoj.gov.

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