

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

Daniel Avila Marin,

Petitioner,

--against--

Bondi, et al.,

Respondents.

Case No.

Agency Number: A



**PETITIONER'S
MOTION FOR A
TEMPORARY
RESTRAINING ORDER
AND PRELIMINARY
INJUNCTION**

Pursuant to Fed. R. Civ. P. 65, Petitioner, Daniel Avila Marin ("Petitioner") (A 092-178-362), by and through undersigned counsel, hereby moves this Court for a Temporary Restraining Order and a Preliminary Injunction enjoining the Respondents in the above captioned matter from continuing detention nor from removing him from the United States until further order of this court. In support of this Motion, Petitioner relies upon the Verified Petition for Writ of Habeas Corpus and the Memorandum of Points and Authorities in Support of this motion submitted herewith, and the exhibits submitted with those documents.

WHEREFORE, Petitioner respectfully prays that the Court:

- (a) grant Petitioner's Motion for a Temporary Restraining Order and Preliminary Injunction;

1 (b) enter an Order enjoining Respondents and their agents from removing
2 Petitioner Avila from the United States until further order of the Court;
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4 (c) enter an Order requiring Respondents to release Petitioner from
5 detention;
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7 (d) enter an Order requiring Respondents to notify Petitioner's counsel and
8 the Court five days in advance of any imminent removal, and
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10 (e) grant Petitioner such other, further and additional relief as the Court
11 deems just and appropriate.
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13 Dated: September 5, 2025,
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15 By: /s/Siovhan Sheridan Ayala

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