

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION**

MOISES ANGEL FUENTES,	)	
	)	
Petitioner,	)	
	)	
v.	)	
Todd LYONS, in his capacity as	)	
Acting Director, Immigration and	)	
Customs Enforcement; Kristi	)	Case No. 5:25-cv-153
NOEM, Secretary, U.S.	)	
Department of Homeland Security;	)	
Pamela BONDI, U.S. Attorney	)	
General; EXECUTIVE OFFICE	)	
FOR IMMIGRATION REVIEW;	)	
NORBAL VASQUEZ, Warden of	)	
Rio Grande Processing Center	)	
,	)	
Respondents.	)	
	)	

**MOTION FOR PRELIMINARY INJUNCTION
AND TEMPORARY RESTRAINING ORDER**

Pursuant to Fed. R. Civ. P. 65, petitioner Mr. Moises Angel Fuentes moves this Court for a Preliminary Injunction and Temporary Restraining Order enjoining respondents from violating her rights under Fifth Amendment, the APA, and immigration laws by declaring that he is subject to mandatory detention. In support of this motion, Mr. Moises Angel Fuentes relies upon the attached memorandum of law. A proposed Order is attached.

Respectfully submitted,

/s/ Jennifer Scarborough
Jennifer Scarborough
TX State Bar No. 24106401
SDTX I.D. 3566791
Email: jennifer@texasborderlawyer.com
Law Firm of Jennifer Scarborough
PO Box 18460, Minneapolis, MN 55418

CERTIFICATE OF SERVICE

I certify that I caused a copy of the foregoing

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to be served on all counsel of record via ECF.

Dated this 20th day of Sept. 2025,

/s/ Jennifer Scarborough
Jennifer Scarborough