

**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.	)	
	)	

**EMERGENCY 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 his rights under Fifth Amendment, the APA, and immigration laws by declaring that the bond hearing Respondents provided to him was constitutionally inadequate and a violation of his right to due process. 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

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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 24th day of Oct. 2025,

/s/ Jennifer Scarborough
Jennifer Scarborough