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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Hassanatou Diallo, Baby Diallo and Newborn Diallo, Petitioners v. William P. JOYCE, in his official capacity as New York Field Office Director for U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; Caleb VITELLO, in his official capacity as the Acting Director for U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; Rodney S. SCOTT, in his official capacity as Commissioner of U.S. CUSTOMS AND BORDER PROTECTION; Kristi NOEM, in her official capacity as Secretary of the U.S. DEPARTMENT OF HOMELAND SECURITY; UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT; UNITED STATES CUSTOMS AND BORDER PROTECTION, Respondents.	Case No. 1:25-cv-05960

PETITIONER'S EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

Petitioners respectfully request that the Court grant their Emergency Motion for a Temporary Restraining Order and Preliminary Injunction. Specifically, the Petitioner's seek an emergency order:

1. Declaring Petitioners' detention to be unlawful and ordering her immediate release from custody on her own recognizance or, in the alternative, on whatever minimal conditions the Court deems necessary.
2. Ordering Respondents and all agents or those acting in collaboration with Respondents to provide undersigned counsel with immediate, unfettered, and private confidential access to Petitioners.
3. In the alternative, if the Court does not order Petitioners immediate release, and injunction against Respondents from moving her out of the hospital until such time as it is safe for both of them to be release and, thereafter, from moving or transferring Petitioners outside of the Eastern District of New York.

The grounds for this motion are set forth in the accompanying memorandum of law, exhibits in support thereof, the Complaint, and the applicable law. A proposed order also accompanies this motion.

Respectfully submitted,

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