

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

Selvin Wilfredo Juarez Mendez,

Petitioner,

Case No.

v.

Hon.

Kristi Noem, et al.,

Respondents.

**MOTION FOR MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT
OF PETITIONER'S MOTION FOR TEMPORARY RESTRAINING ORDER**

Petitioner respectfully moves this Court for a Temporary Restraining Order to preserve jurisdiction and prevent irreparable harm pending resolution of his habeas petition. Petitioner further requests that this Court grant the writ of habeas corpus, declare Respondents' application of 8 U.S.C. § 1225(b)(2)(A) unlawful, and order either his immediate release or, at a minimum, a prompt individualized custody redetermination hearing before an Immigration Judge under 8 U.S.C. § 1226(a). For the reasons stated in the accompanying brief in support of this motion, Defendant respectfully requests that the Court grant the relief sought herein.

Dated: October 29, 2025

Respectfully submitted,
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