UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Yurbelis SANGRONIS WANDET,
Jesus SANDOVAL SEQUERA,
[redacted];

Petitioner,

v.

LaDeon FRANCIS, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Todd LYONS, in his official capacity as Acting Director U.S. Immigrations and Customs Enforcement; Kristi NOEM in her official capacity as Secretary of Homeland Security; Pam BONDI, in her official capacity as Attorney General.

Respondents.

Case No. 1:25-cv-09011

NOTICE OF MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUCTION

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 65 and the Court's authority under the All Writs Act, Petitioners hereby move this Court to issue an order enjoining Respondents from transferring Petitioner Jesus Sandoval Sequera out of the New York City area or in the alternative, to the extent he has already been so transferred, to order that he be returned. In support of this motion, Petitioner respectfully submits a Memorandum of Law and Exhibits.

As detailed in the accompanying Memorandum of Law and supporting materials, as well as the petition for writ of habeas corpus filed last week, Petitioners are a young family consisting of two parents and their young daughter. After arriving in the U.S. over two years ago, the family

filed a timely asylum application and appeared in immigration court, including most recently on Oct. 30, 2025. At the conclusion of that hearing, at which an immigration judge set another hearing next year, masked agents surrounded Petitioners and detained them. Ms. Sangronis Wendet was subsequently released along with the couple's daughter, but Mr. Sandoval Sequera was detained in custody and transferred to a detention center in Newark, New Jersey. There he was able to meet with counsel and intended to have his first visit with family in two days, on November 8. But today, November 6, his family and counsel learned that he faces imminent transfer elsewhere in the U.S.

Counsel for petitioner reached out to Respondents' counsel and two of his colleagues to ask that Respondents agree not to transfer Petitioner. Respondents' counsel agreed to make such a request but so far has not communicated a response. (Although no notice of appearance has been entered, the U.S. Attorney's Office has advised that assigned counsel is David Kennedy, David.Kennedy2@usdoj.gov.)

ECF-stamped copies of this filing, including the notice of motion, memorandum of law, exhibits and proposed order will be provided to Respondents' counsel via email immediately after filing.

Dated: November 6, 2025

Respectfully submitted,

/s/ Paige Austin
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Counsel for Petitioner

CERTIFICATE OF SERVICE

I certify that on November 6, 2025, I electronically filed the attached the foregoing Notice of Motion and accompanying Proposed Order and Memorandum of Law with the Clerk of the Court for the United States District Court for the Southern District of New York using the CM/ECF system. Service will therefore be effected by the CM/ECF system.

/s/ Paige Austin
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