A Number: [redacted]

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Abdou Tall, and **Madou Kone**, as Next Friend Petitioners/Plaintiffs, **v.** **WILLIAM JOYCE**, in his official capacity as Acting New York Field Office Director for U.S. Immigration and Customs Enforcement; **KRISTI NOEM**, in her official capacity as Secretary, U.S. Department of Homeland Security; **TODD LYONS**, in his official capacity as Director, U.S. Immigration and Customs Enforcement; U.S. DEPARTMENT OF HOMELAND SECURITY; and U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT Respondents/Defendants.	**Civil Action No.:**

PETITIONER'S NOTICE OF EMERGENCY MOTION FOR A TEMPORARY RESTRAINING ORDER

Moving Party: Plaintiff-Petitioner

Place: United States District Court for the Southern District of New York
David Patrick Moynihan Courthouse
500 Pearl Street
New York, 10007

Relief Sought: Pursuant to Federal Rules of Civil Procedure 65(b)(2) ("Fed. R. Civ. P."), Petitioner respectfully moves the Court for a temporary restraining order pending adjudication of his/her Complaint and Verified Petition for Writ of Habeas Corpus ("Petition")

Papers Submitted in Support:	Petition and Exhibits thereto and Memorandum of Law
Intent to Reply:	Petitioner respectfully requests the opportunity to respond to any responses filed by Respondents to the instant motion.

Dated: 11/23/2025
New York, NY

Respectfully submitted,

s/ Madou Kone
Madou Kone

Next Friend of Petitioner (pro se)

Name: Abdou Tall