UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

LUZ DARY HINESTROZA ARANGO,
(A [redacted]),
Petitioner,
KENNETH GENALO, NYC Director Enforcement & Removal Operations Immigration and Customs Enforcement (ICE); TODD LYONS, Acting Director, U.S. Immigration and Customs Enforcement; KRISTI NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; and PAMELA BONDI, in her official capacity as Attorney General, U.S. Department of Justice,
Respondents.

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Civil Action No. _____

EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE

Petitioner Luz Dary Hinestroza Arango, by and through undersigned counsel respectfully moves this Honorable Court pursuant to Rule 65 of the Federal Rules of Civil Procedure for the issuance of a Temporary Restraining Order ("TRO") to prohibit Respondents, their officers, agents, employees, and all persons acting in concert with them from transferring Petitioner out of the jurisdiction of the Southern District of New York while his Petition for Writ of Habeas Corpus (filed contemporaneously) remains pending.

As grounds for this motion, Petitioner states:

1. Petitioner is currently detained by ICE within the Eastern District of New York at 100 Federal Plaza Central Islip, NY as of 9:00 PM on Thursday, December 4, 2025.

2. Petitioner has filed a habeas corpus petition seeking immediate release based on unlawful detention, as well as due process violations.

3. Petitioner has not been placed in removal proceedings and neither has she or would ever be been granted bond or parole due to unlawful agency policy under Matter of Yajure Hurtado, 29 I&N Dec. 216 (BIA 2025) which prohibits release.

4. Petitioner is not a danger to the community and poses no flight risk.

5. Petitioner is qualified for, and in the process of Adjustment of Status.

6. Transfer of Petitioner at this stage would irreparably harm her by obstructing access to legal counsel and interfering with judicial review.

7. Emergency relief is necessary to preserve the Court's jurisdiction and protect Petitioner's constitutional rights.

WHEREFORE, Petitioner respectfully requests that this Court:

A. Issue an immediate Temporary Restraining Order enjoining Respondents from transferring Petitioner out of the jurisdiction of the Eastern District of New York pending resolution of the habeas petition;

B. Issue an Order to Show Cause directing Respondents to explain why a preliminary injunction should not issue; and

C. Grant any further relief that this Court deems just and proper.

Dated: December 4, 2025

Respectfully submitted,

/s/ S. Michael Musa-Obregon
S. Michael Musa-Obregon, Esq.

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