

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT**

E.H.C.F., a minor, by and through his
Next Friend, MILEIDY YAMALY
CONTRERAS FLORES,

Petitioners/Plaintiffs,

v.

Robert F. KENNEDY, JR. in his official
capacity as Secretary of Health and
Human Services; Angie SALAZAR, in
her official capacity as Acting Director of
the Office for Refugee Resettlement;
Regina MOLLER, Director of Noank
Community Support Services; U.S.
Department of Health and Human
Services (HHS); U.S. Office of Refugee
Resettlement (ORR); Noank Community
Support Services (NCSS)

Respondents/Defendants.

Civil Case No.: 3:25-cv-02142

**PLAINTIFF-PETITIONER'S EMERGENCY MOTION FOR A TEMPORARY
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

Pursuant to Fed. R. Civ. P., Rule 65 (a) and (b), Plaintiff-Petitioner moves for a preliminary injunction, or in the alternative, a temporary restraining order, directing the Defendant-Respondents to release from their custody forthwith E.H.C.F., age 16, and to place him in the custody of his mother, Mileidy Yamaly Contreras Flores.

As detailed in the accompanying memorandum and in the Plaintiff-Petitioner's Petition for a Writ of Habeas Corpus and Complaint for Injunctive and Declaratory Relief (Dkt. No. 1), E.H.C.F. has been in the custody of the Office of Refugee Resettlement ("ORR") for over 225 days. The Defendant-Respondents prolonged detention and separation of E.H.C.F. violate his constitutional, statutory, and regulatory rights, constituting irreparable harm. Each day that

E.H.C.F. remains in Defendant-Respondent's custody, he continues to suffer emotional damage, physical pain, and educational deprivation.

WHEREFORE, the Plaintiff-Petitioner respectfully requests that the Court issue a preliminary injunction, or in the alternative, a temporary restraining order, ordering the Defendant-Respondents to release E.H.C.F. from their custody immediately, without restraints on his liberty, and to place him in the custody of his mother, Mileidy Yamaly Contreras Flores.

Dated: December 23, 2025

Respectfully submitted,

/s/ Leanne R. Gale

Leanne R. Gale (Pro Hac Vice Forthcoming)

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