UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF NEW YORK

JONATHAN BRAVO ARIZMENDI,

Petitioner,

v.

KRISTI NOEM, in her official capacity as Secretary of the U.S. Department of Homeland Security;

TODD LYONS, in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement;

WILLIAM JOYCE, in his official capacity as Field Office Director of Enforcement and Removal Operations of the New York Office of U.S. Immigration and Customs Enforcement;

PAMELA BONDI, in her official capacity as U.S. Attorney General; and

RAUL MALDONADO, Jr., in his official capacity as Warden of the Metropolitan Detention Center;

Respondents.

Civil Action No. 25-7056

ORAL ARGUMENT REQUESTED

EXPEDITED HEARING REQUESTED

MOTION FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

Petitioner-Plaintiff Jonathan Bravo Arizmendi ("Mr. Bravo Arizmendi" or "Petitioner") respectfully moves the Court for the entry of a temporary restraining order ("TRO") and preliminary injunction ordering his release, and restraining Respondents from detaining Mr. Bravo Arizmendi pending the Court's final adjudication of his Petition. *See* Fed. R. Civ. P. 65. As detailed in the accompanying Memorandum of Law, all four relevant factors weigh heavily in favor of injunctive relief. Accordingly, Mr. Bravo Arizmendi asks the Court to enter the

accompanying Proposed Temporary Restraining Order, and order Respondents to promptly show cause why a preliminary injunction should not issue.

Date: December 23, 2025

Respectfully submitted,

AKIN GUMP STRAUSS HAUER & FELD LLP

By: */s/ Stephen M. Baldini*

Stephen Baldini
Andrew A. McWhorter
Dara R. Mouhot
Akin Gump Strauss Hauer & Feld LLP
One Bryant Park
New York, NY 10036
Telephone: (212) 872-1000
Facsimile: (212) 872-1002
sbaldini@akingump.com
amcwhorter@akingump.com
dmouhot@akingump.com

Attorneys for Petitioner
Jonathan Bravo Arizmendi