UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF NEW YORK

REAGAN EMILIO SANCHEZ ATZ,

Petitioner-Plaintiff,

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;

KENNETH GENALO, 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-Defendants.

Civil Action No. _____

ORAL ARGUMENT REQUESTED

EXPEDITED HEARING REQUESTED

MOTION FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

Petitioner Reagan Emilio Sanchez Atz ("Mr. Sanchez") respectfully moves the Court for the entry of a temporary restraining order and preliminary injunction ordering his release and restraining Respondents from detaining Mr. Sanchez pending the Court's final adjudication of his petition for a writ of habeas corpus. *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. Sanchez 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: January 14, 2026

Respectfully submitted,

AKIN GUMP STRAUSS HAUER & FELD LLP

By: */s/ Avi E. Luft*

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