

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

DENIS BULYCHEV,

Petitioner,

v.

Case No. 4:26-cv-193

TODD LYONS, Acting Director of ICE;
JASON STREEVAL, Warden, Stewart
Detention Center; **KRISTEN SULLIVAN**,
Acting ERO Director of Atlanta Field
Office, U.S. Immigration and Customs
Enforcement (“ICE”); **KRISTI NOEM**,
Secretary of the U.S Department of
Homeland Security; **PAM BONDI**,
Attorney General of the United States; and
WILLIAM KEYES, U.S. Attorney for the
Middle District of Georgia,
in their official capacities,

Respondents.

**PETITIONER’S NOTICE AND MOTION FOR TEMPORARY
RESTRAINING ORDER**

COMES NOW, Denis Bulychev, Petitioner in the above-styled and numbered cause, by and through the undersigned attorney of record, and for cause of action hereby files this notice and motion for a temporary restraining order (“TRO”) pursuant to Federal Rule of Civil Procedure 65(b) to enjoin Respondents

from transferring Petitioner out of this District or deporting him during the pendency of the underlying proceedings.

Because Petitioner's detention violates the Due Process Clause of the Fifth Amendment to the United States, Petitioner respectfully requests that this Court (1) order Petitioner's immediate release from Respondents' custody pending these proceedings, without requiring bond or electronic monitoring, or, in the alternative, (2) order Petitioner's immediate release from Respondents' custody and, within 14 days, order a pre-deprivation bond hearing before the Stewart Immigration Court, where Respondents shall bear the burden of proof to show, by clear and convincing evidence, that Petitioner is a danger or a flight risk. To preserve this Court's jurisdiction, Petitioner further seeks an order enjoining Respondents from transferring Petitioner out of this District or deporting him during the pendency of the underlying proceedings.

This motion is based on this Notice of Motion and Motion; the accompanying Memorandum of Points and Authorities; the supporting declarations, the papers, evidence, and records on file in this action; and any other written or oral evidence or argument as may be presented at or before the time this motion is heard by the Court. This motion is also supported by the Petition for Writ of Habeas Corpus (ECF No. 1).

Consistent with Fed. R. Civ. P. 65, Petitioners seeks relief at the earliest

possible opportunity. Petitioner is filing this motion the same day he filed his Petition for Writ of Habeas Corpus.

Respectfully submitted,

This 13th day of February, 2026.

COCHRAN IMMIGRATION

/s/ Johanna Cochran
by: Johanna Cochran
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Attorney for the Petitioner

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