

FEB 11 2026**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**CLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS
BY OR DEPUTY

RONAL MIGUEL REYES BLAZQUEZ,
Petitioner,
v.
WARDEN, T. DON HUTTO DETENTION
CENTER, et al.,
Respondents.

Case No. **1:26 CV 00329**Judge: David A. Ezra**EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 65****IMMEDIATE HEARING REQUESTED***Petitioner's Immigration Hearing: February 12, 2026, 8:30 AM (10 Days)*

Petitioner RONAL MIGUEL REYES BLAZQUEZ, through his Next Friend and first cousin YENEYSI QUEVEDO, respectfully moves this Honorable Court, pursuant to Federal Rule of Civil Procedure 65, for a Temporary Restraining Order Prohibiting Respondents from removing, deporting, or transferring Petitioner pending resolution of his Emergency Petition for Writ of Habeas Corpus.

I. NATURE OF THE EMERGENCY

1. Petitioner RONAL MIGUEL REYES BLAZQUEZ is a 22-year-old citizen of Cuba who entered the United States **LEGALLY** on April 16, 2024, pursuant to **HUMANITARIAN PAROLE (CHP)** under the CHNV program.

2. Petitioner holds a valid **Employment Authorization Document (EAD)**, Category C11, valid until April 15, 2026.

3. Petitioner has a pending **I-485 Application for Adjustment of Status under the Cuban Adjustment Act**, received by USCIS on October 23, 2025 (Receipt Number .

4. Petitioner has **NO CRIMINAL RECORD WHATSOEVER**. He has never been arrested, charged, or convicted of any crime.

5. Petitioner was arrested by ICE at a gas station solely because his driver's license was expired—a minor civil traffic matter, **NOT a crime**.

6. Petitioner is now detained at the **T. Don Hutto Detention Center**, 1001 Welch Street, Taylor, Texas 76574 (A# .

7. Petitioner has a **Master Calendar Hearing** scheduled for **FEBRUARY 12, 2026, at 8:30 AM**—only **10 DAYS** from today.

8. Without a TRO, Petitioner faces imminent deportation to **CUBA**—a communist dictatorship—where he would face persecution and would permanently lose his right to adjust status under the Cuban Adjustment Act.

II. LEGAL STANDARD

9. Under *Winter v. Natural Resources Defense Council*, 555 U.S. 7, 20 (2008), a party seeking a TRO must demonstrate: (1) likelihood of success on the merits; (2) likelihood of irreparable harm; (3) balance of equities in petitioner's favor; and (4) public interest.

III. PETITIONER IS LIKELY TO SUCCEED ON THE MERITS

10. Petitioner entered the United States legally under Humanitarian Parole.

11. Petitioner has a pending Cuban Adjustment Act application that USCIS has accepted.

12. Petitioner has no criminal record, not even a traffic ticket (other than the expired license).

13. Petitioner has valid work authorization and has been working legally.

14. Petitioner's detention while his Cuban Adjustment Act case is pending violates due process.

15. Petitioner had never been in removal proceedings before this arrest—he was arrested solely for an expired license.

IV. PETITIONER WILL SUFFER IRREPARABLE HARM

16. Without a TRO, Petitioner faces:

(a) **DEPORTATION TO CUBA:** Cuba is a communist dictatorship. Petitioner fled Cuba seeking freedom and opportunity in the United States.

(b) **PERMANENT LOSS OF CUBAN ADJUSTMENT ACT RIGHTS:** If deported, Petitioner will permanently lose his right to adjust status under the Cuban Adjustment Act.

(c) **SEPARATION FROM FAMILY:** Petitioner's first cousin, YENEYSI QUEVEDO, is a U.S. resident. Deportation would separate him from his family.

(d) **CONSTITUTIONAL VIOLATION:** "[I]t is well established that the deprivation of constitutional rights 'unquestionably constitutes irreparable injury.'" *Melendres v. Arpaio*, 695 F.3d 990, 1002 (9th Cir. 2012).

V. BALANCE OF EQUITIES AND PUBLIC INTEREST

17. The harm to Petitioner—deportation to Cuba, permanent loss of his Cuban Adjustment Act application—vastly outweighs any harm to the government.

18. Petitioner poses no flight risk and no danger. He has no criminal record. He has valid work authorization. He has family in the United States.

19. "[I]t is always in the public interest to prevent the violation of a party's constitutional rights." *Melendres*, 695 F.3d at 1002.

VI. RELIEF REQUESTED

WHEREFORE, Petitioner respectfully requests that this Honorable Court enter a Temporary Restraining Order:

(1) **PROHIBITING** Respondents from removing, deporting, or transferring Petitioner from the United States.

23. Ronal is currently detained at the **T. Don Hutto Detention Center**, located at 1001 Welch Street, Taylor, Texas 76574. His Alien Registration Number (A#) is [REDACTED]

24. Ronal has a **Master Calendar Hearing** scheduled for **February 12, 2026, at 8:30 AM**, before Immigration Judge Eric J. Tijerina, at the Immigration Court located at 566 Veterans Drive, Pearsall, Texas 78061.

25. That hearing is only **10 DAYS AWAY**. Without immediate action by this Court, Ronal could be deported before he has a chance to fight his case.

VIII. WHY RONAL SHOULD BE RELEASED

26. Ronal is NOT a flight risk. He has family here—me. He has been living and working in Texas. He has a pending green card application. He has every reason to stay and fight his case, not run.

27. Ronal is NOT a danger to the community. He has NO criminal record. He has never hurt anyone. He is a peaceful, hardworking young man.

28. If Ronal is released, I will ensure that he appears at all immigration hearings. I am willing to serve as his sponsor and take responsibility for ensuring his compliance with any conditions the Court may impose.

29. Ronal came to the United States the right way. He applied for the CHNV program, was approved, and was paroled in. He got a work permit. He worked. He applied for his green card under the Cuban Adjustment Act. He did everything right. It is unjust to deport him because his driver's license expired.

IX. CONCLUSION

30. I respectfully ask this Honorable Court to grant Ronal's petition, order his immediate release, and prevent his deportation to Cuba.

31. Ronal deserves a chance to have his Cuban Adjustment Act case decided. He should not be deported for an expired driver's license.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 9 Febraury 2026
Location: Austin TX

YENEYSI QUEVEDO
First Cousin of Petitioner

Address: [REDACTED]
Austin-Tx [REDACTED]

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