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

AMY TOOKE, as Next Friend of

RENZO ZUNIGA MACCHIAVELLO (A# 240 275 974),

Petitioner,

v.

KRISTI NOEM, Secretary, U.S. Department of Homeland Security;

TODD M. LYONS, Senior Official Performing the Duties of the Director, U.S.
Immigration and Customs Enforcement;

WARDEN, IRWIN COUNTY DETENTION CENTER;

Respondents.

Civil Action No.: _____

**EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER
(ANTI-REMOVAL / ANTI-TRANSFER / ANTI-THIRD COUNTRY REMOVAL)**

Petitioner respectfully moves this Court pursuant to Rule 65 of the Federal Rules of Civil Procedure and the All Writs Act, 28 U.S.C. § 1651, for issuance of a Temporary Restraining Order (TRO) prohibiting Respondents from removing, transferring, or deporting Renzo Zúñiga Machiavello while the pending Petition for Writ of Habeas Corpus is adjudicated.

I. GROUNDS FOR TEMPORARY RESTRAINING ORDER

1. Likelihood of Success on the Merits: The underlying habeas petition presents

substantial constitutional claims regarding prolonged civil detention, due process violations, excessive force, and unconstitutional conditions of confinement.

2. Irreparable Harm: Removal or transfer—including removal to a third country—would cause immediate and irreparable harm, including loss of access to counsel, separation from family, and potential mootness of this Court's jurisdiction.

3. Balance of Equities: The harm to Mr. Zuniga outweighs any administrative inconvenience to Respondents. Preservation of the status quo is necessary to ensure meaningful judicial review.

4. Public Interest: The public interest favors adherence to constitutional protections and preventing unlawful executive detention.

II. REQUEST FOR RELIEF

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

A. Prohibiting Respondents from removing Mr. Zuniga from the United States while this habeas action is pending;

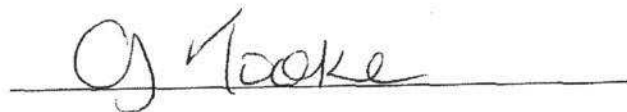
B. Prohibiting transfer of Mr. Zuniga outside the jurisdiction of this Court without prior notice and Court authorization;

C. Prohibiting removal to any third country without prior written notice and opportunity to be heard;

D. Maintaining the status quo pending final resolution of the habeas petition;

E. Granting such further relief as this Court deems just and proper.

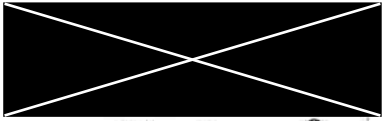
Respectfully submitted,



AMY TOOKE

Next Friend for Renzo Zuniga Macchiavello





Date: FEB. 24, 2026