

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA COLUMBUS DIVISION
CASE NO. 4:26-CV-351 (To be assigned)

TALGATBEK BUSURMANKULOV,

Petitioner,

v.

TODD M. LYONS, et al.,

Respondents.

EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER
(PROHIBITING TRANSFER)

Petitioner moves for entry of a Temporary Restraining Order prohibiting Respondents from transferring Petitioner outside the Middle District of Georgia during the pendency of this habeas proceeding.

Grounds

1. Transfer would frustrate this Court's jurisdiction under 28 U.S.C. § 2241.
2. ICE frequently transfers detainees following habeas filings.
3. Irreparable harm would result if Petitioner were removed from this District.
4. The balance of equities favors maintaining the status quo.
5. The public interest favors orderly judicial review.

Petitioner requests expedited consideration and entry of an order prohibiting transfer pending resolution of the Petition.

Sulaika Busurmankulova

By / _____ /

Sulaika Busurmankulova

(Petitioner Talgatbek Busurmankulov's Wife)

As Next Friend of Petitioner

108 N Cedar lake Road

Round Lake il 60073



State of Washington

County of King

I certify that I know or have satisfactory evidence that SULAIKA BUSURMANKULOVA is the person who appeared before me, and that said person signed this instrument and acknowledged it to be his or her free and voluntary act for the uses and purposes mentioned in the instrument.

A handwritten signature in cursive script, likely of the notary public.

Evgeny Ryzhov Notary Public in and for the State of Washington

Evgeny Ryzhov
Notary Public
State of Washington
Commission Number:WA
My Commission Expires
March 24, 2027

This Notarial Act involved two-way audio/video communication technology on 02/26/2026 9:11pm EST.