UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

EDWIN JEOVANNY CATALAN CATALAN,

Petitioner-Plaintiff,

Civil Action No. _____

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;

RAUL MALDONADO, Jr., in his official capacity as Warden of the Metropolitan Detention Center;

Defendant-Respondents

ORAL ARGUMENT REQUESTED

EXPEDITED HEARING REQUESTED

MOTION FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

Petitioner-Plaintiff Edwin Jeovanny Catalan Catalan ("Mr. Catalan Catalan" or "Petitioner") respectfully moves the Court for the entry of a temporary restraining order ("TRO") and preliminary injunction ordering his release and restraining Respondents from detaining Mr. Catalan Catalan pending the Court's final adjudication of his Petition. 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. Catalan Catalan asks the Court to enter the accompanying Proposed Temporary Restraining Order, and order Respondents to promptly show cause why a preliminary injunction should not be issued.

Date: March 20, 2026

Respectfully Submitted,

AKIN GUMP STRAUSS HAUER & FELD LLP

By: /s/ Katherine Porter

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