

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF GEORGIA

ZHENG RUN ZHENG (A# ) :

Case No:

PETITIONER, :

v. :

JASON STREEVAL, in his official capacity as  
Warden of the ERO Stewart  
Detention Facility :

**MOTION FOR TEMPORARY  
RESTRAINING ORDER**

RICARDO WONG, in her official  
capacity as Field Office Director of the  
Stewart Field Office of U.S.  
Immigration and Customs Enforcement,  
Enforcement and Removal Operations :

TODD LYONS, in his official capacity as  
Acting Director and Senior Official  
Performing the Duties of the Director of U.S.  
Immigration and Customs Enforcement :

PAMELA BONDI, in her official capacity as  
Attorney General :

**RESPONDENTS.** :

**EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER (TRO)**

**(Do Not Remove Me or Transfer Me While My Habeas Case Is Pending)**

I, Zheng Run Zheng, ask the Court for an emergency Temporary Restraining Order ("TRO") under Rule 65 of the Federal Rules of Civil Procedure. This request is connected to my habeas petition under 28 U.S.C. § 2241.

**A. What I am asking for**

I ask the Court to order:

1. **No removal:** ICE cannot remove (deport) me from the United States while my habeas case is pending.
2. **No transfer out of GEORGIA:** ICE cannot transfer me outside the District of Georgia while my habeas case is pending.
3. **Advance notice:** ICE must give me at least 72 hours' written notice before any transfer or removal.

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4. **Fast schedule:** A quick deadline for the government to respond and a prompt hearing date if needed.

#### **B. My situation**

1. I arrived in the United States in February 12, 1992, and I have lived and worked in the United States for over two decades with my wife and one USC son.
2. I received an order of Deportation in October 17, 1996 and BIA dismissed my appeal.
3. On July 10, 2025 I was detained by the ICE at Highway I-85 while I drove. I have no criminal record since I live in the United States.
4. I am filing a habeas petition because I believe my long detention without a real chance for release violates the Constitution (due process)
5. I am afraid ICE may transfer me to another state or remove me before this Court can decide my habeas case.

#### **C. Why I need emergency help**

Federal courts can issue a TRO when:

1. The person is likely to win, or at least has a serious legal claim;
2. The person will be harmed in a way that cannot be fixed later (irreparable harm);
3. The balance of harms favors the person asking for the TRO; and
4. The public interest supports the order.

I meet these requirements because:

- **Irreparable harm:** If ICE removes me, I may lose my chance for this Court to decide my habeas petition and I could be separated from the United States permanently. If ICE transfers me far away, it becomes much harder to access the Court and prepare my case. Also, each day of detention is a serious loss of liberty that cannot be undone later.
- **Serious legal claim:** I have been detained for over a year without a bond hearing, and the Immigration Judge said the immigration court has no power to give me one. I believe due process requires a meaningful chance to ask for release when detention becomes very long.
- **Balance of harms:** A short order to keep me in GEORGIA and not remove me only preserves the situation long enough for the Court to decide my case. It does not decide my immigration case and does not stop the government from opposing my habeas petition.
- **Public interest:** The public interest favors court review and preventing removal or transfer that would block the Court from giving effective relief.

#### **D. Notice to the government (fill in what you did)**

I certify I tried to notify the government:

- On March 23, 2026, I sent this motion to the U.S. Attorney's Office / government lawyer by filing it by mail.
- I am requesting emergency relief because ICE can transfer or remove people with little or no notice.

**E. Request**

For these reasons, I respectfully ask the Court to issue a Temporary Restraining Order preventing my removal and transfer out of GEORGIA, requiring advance notice, and setting an expedited schedule.

Dated:

Respectfully submitted,

  
ZHENG RUN ZHENG  
STEWART DETENTION CENTER  
146 CCA ROAD NA  
LUMPKIN, GA 31815