UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SANCHEZ SANCHEZ, Petitioner, v. FEDERAL DETENTION CENTER PHILADELPHIA, et al., Respondents.	Case No. 2:26-cv-02608 Motion for Temporary Restraining Order

MOTION FOR TEMPORARY RESTRAINING ORDER

Now comes the Petitioner, Raul Sanchez Sanchez, by and through his undersigned counsel, and hereby moves for a Temporary Restraining Order enjoining the Respondents from moving Petitioner outside the Commonwealth of Pennsylvania during the pendency of these proceedings. In support of this motion, Petitioner avers the following:

It is undersigned counsel's experience that Petitioner will likely be moved to a staging area such as Arizona or Louisiana, and then funneled to a detention center in such places as Mississippi, Colorado, Texas, or beyond. This movement disrupts the attorney/client working relationship and places even more undue stress on Petitioner's wife, daughter, and loved ones.

Further, Petitioner has been living peacefully in Delaware for the past four years and in the Delaware/Maryland area since his last entry in 2011. He has established roots in the Delaware community with his wife and children. Petitioner

has lived in Delaware for about four years. He has worked the same job at a Delaware pizzeria since 2011 with his wife and paid taxes.

Petitioner being detained far afield in the United States, away from his children, wife, and immigration counsel, will cause irreparable harm to his ability to diligently prepare his applications for immigration relief. Undersigned counsel has experienced increasing difficult in scheduling remote virtual visits with detained clients repeatedly transferred to detention centers across the country. Detainees in various detention centers have less and less access to their legal counsel, ostensibly because detention centers do not have the resources to provide virtual visits or even phone calls to detainees trying to work with their attorneys.

We respectfully request this Honorable Court issue a Temporary Restraining Order enjoining Respondents from moving Petitioner outside the Commonwealth of Pennsylvania during the pendency of this proceeding.

Based on these signed documents and under the Federal Rule of Civil Procedure 65 and the Local Rule of Civil Procedure 65.1, the Petitioner respectfully requests a Temporary Restraining Order in support his Petition for Writ of Habeas Corpus.

Dated: April 21, 2026

Respectfully submitted,

/s/Pretty S. Martinez

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After reviewing the Motion for Temporary Restraining Order preventing Respondents from moving Petitioner Raul Sanchez Sanchez outside the Commonwealth of Pennsylvania during the pendency of this proceeding, it is hereby ordered as follows:

The Motion is hereby granted.

IT IS SO ORDERED.

Dated:

_____
U.S.D.J.