

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

DANY BLANCO NEGREROS,)

Petitioner,)

v.)

Case No. **4:26-cv-723**

TODD LYONS, Acting Director of ICE;)

JASON STREEVAL, Warden, Stewart)

Detention Center; **KRISTEN SULLIVAN**,)

Acting ERO Director of Atlanta Field)

Office, U.S. Immigration and Customs)

Enforcement (“ICE”); **MARKWAYNE**)

MULLIN, Secretary of the U.S Department)

of Homeland Security; **TODD BLANCHE**,)

Acting Attorney General of the United)

States; and **WILLIAM KEYES**, U.S.)

Attorney for the Middle District of Georgia,)

in their official capacities,)

Respondents.)

**PETITIONER’S NOTICE AND MOTION FOR TEMPORARY
RESTRAINING ORDER**

COMES NOW, Dany Blanco Negreros, Petitioner in the above-styled and numbered cause, by and through the undersigned attorney of record, and for cause of action hereby files this notice and motion for a temporary restraining order

(“TRO”) pursuant to Federal Rule of Civil Procedure 65(b) to request immediate release of Petitioner and to enjoin Respondents from transferring Petitioner out of this District or deporting him during the pendency of the underlying proceedings.

Because Petitioner’s detention violates the Due Process Clause of the Fifth Amendment to the United States, Petitioner respectfully requests that this Court (1) order Petitioner’s immediate release from Respondents’ custody pending these proceedings, without requiring bond or electronic monitoring, or, in the alternative, (2) order Petitioner’s immediate release from Respondents’ custody and, within 14 days, order a pre-deprivation bond hearing before the Stewart Immigration Court, where Respondents shall bear the burden of proof to show, by clear and convincing evidence, that Petitioner is a danger or a flight risk. To preserve this Court’s jurisdiction, Petitioner further seeks an order enjoining Respondents from transferring Petitioner out of this District or deporting him during the pendency of the underlying proceedings.

This motion is based on this Notice of Motion and Motion; the accompanying Memorandum of Points and Authorities; the supporting declarations, the papers, evidence, and records on file in this action; and any other written or oral evidence or argument as may be presented at or before the time this motion is heard by the Court.

This motion is also supported by the Petition for Writ of Habeas Corpus (ECF No. 1).

Consistent with Fed. R. Civ. P. 65, Petitioners seeks relief at the earliest possible opportunity. Petitioner is filing this motion the same day he filed his Petition for Writ of Habeas Corpus.

Pursuant to Fed. R. Civ. P. 65(b)(1)(B), as of this filing, Respondents have not stipulated to a TRO.

Respectfully submitted,

This 29th day of April, 2026

COCHRAN IMMIGRATION

/s/ Johanna Cochran
by: Johanna Cochran
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Attorney for the Petitioner

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