FILED
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U.S. DISTRICT COURT E.D.N.Y.
★ MAY 06 2026 ★
LONG ISLAND OFFICE

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK
CIVIL ACTION

YESSIMKHAN YELESHEV
(A-Number [redacted])

Petitioner,

v.

1. ANTHONY J. LA ROCCO, Sheriff of Nassau County, in his official capacity, as immediate custodian of Petitioner;

2. ACTING FIELD OFFICE DIRECTOR, U.S. Immigration and Customs Enforcement, Enforcement and Removal Operations, New York Field Office, in his/her official capacity;

3. TODD M. LYONS, Acting Director, U.S. Immigration and Customs Enforcement, in his official capacity;

4. MARKWAYNE MULLIN, Secretary of the U.S. Department of Homeland Security, in his official capacity; and

5. TODD BLANCHE, Acting Attorney General of the United States, in his official capacity,

Respondents.

CV 26 2294

BULSARA, J.

Civil Action No.:

MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

Fed. R. Civ. P. 65

Pursuant to Federal Rule of Civil Procedure 65 and Local Civil Rule 6.1, Petitioner Yessimkhan Yeleshev moves this Court for a Temporary Restraining Order and Preliminary Injunction (i) prohibiting Respondents from transferring Petitioner outside the Eastern District of New York during the pendency of this action and (ii) ordering Petitioner's immediate release

from custody. The grounds are set out in the verified Petition (incorporated by reference) and the accompanying Memorandum of Law in Support of Motion for Temporary Restraining Order. The Rule 65(b)(1)(A) showing of immediate and irreparable injury rests on the verified allegations of the Petition, signed by counsel under Federal Rule of Civil Procedure 11.

WHEREFORE, Petitioner respectfully requests that this Court enter the Proposed Order filed herewith.

Dated: May 4, 2026

Respectfully submitted,

/s/ Robert Bond
Robert Bond, Esq.
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