Milton J. Viquez Rozo
[redacted]

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U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

MILTON J. VIQUEZ ROZO and Ingrid K. Mozo as next friend
Petitioners/Plaintiffs,

v.

RAUL MOLDANADO, JR., in his official capacity as Warden, Brooklyn Metropolitan Detention Center, New York
WILLIAM JOYCE, in his official capacity as Acting New York Field Office Director for U.S. Immigration and Customs Enforcement;
MARCOS CHARLES, in his official capacity as acting Executive Associate Director, Enforcement and Removal Operations;
TODD M. LYONS, in his official capacity as Acting Director Immigration and Customs Enforcement;
MARKWAYNE MULLIN, in his official capacity as Secretary, U.S. Department of Homeland Security; and
ATTORNEY GENERAL, in their official capacity as Attorney General

Respondents/Defendants.

*** EMERGENCY ***

Civil Action No.: **26-cv-03761-LDH**

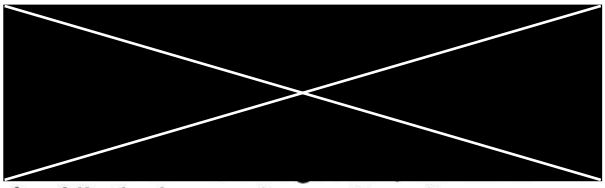
DeArcy Hall

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PETITIONER'S NOTICE OF EMERGENCY MOTION FOR A TEMPORARY RESTRAINING ORDER

Moving Parties: Plaintiff-Petitioner *** Spanish Interpretation Required ***
Milton J. Viquez Rozo
[redacted]
Detained at Brooklyn Metropolitan Detention Center (MDC)
80-29th St. Brooklyn, NY 11232

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ingridkatherinemozobecerra@gmail.com

Place: United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Relief Sought: Pursuant to Federal Rules of Civil Procedure 65(b)(2) ("Fed. R. Civ. P."), Petitioner respectfully moves the Court for an Emergency temporary restraining order pending adjudication of his Complaint and Verified Petition for Writ of Habeas Corpus ("Petition")

Papers Submitted in Support: Petition and Exhibits thereto.

Intent to Reply: Petitioner respectfully requests the opportunity to respond to any responses filed by Respondents to the instant motion.

Dated:June 22, 2026

Respectfully submitted,

Ingrid K. Mozo
Next friend for Milton J. Viquez Rozo