

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK**

**VERNON JONES, MARCKINDAL JULES, LYXON  
CHERY, ALDWIN JUNIOR BRATHWAITE,  
PATRICK MADUABUCHI NWANKWO, DWEEN  
ALFAREL BLACKMAN, RICARDO  
QUINTANILLA-MEJIA, BRIGHT IDADA  
FALODUN, PHILIP DONGA, GAMDUR NARAIN,  
ERIC C. COMMISSIONG, MD. ABU MUSA  
BHUYAN, IBRAHIMA SORY SOW, JUBRIL  
ADELAKOUN, JUAN CARLOS LAINEZ MEJIA,  
CROSWELL WILSON, JONATHAN ESPINAL-  
POLANCO, MARVENS THOMAS,  
SHANTADEWIE RAHMEE, DANILO  
CONCEPCION, OSCAR SALCEDO, CURRY  
WENDELL FORBES, and NECATI HARSIT;**

*Petitioners,*

v.

**CHAD WOLF,  
in his official capacity as Acting Secretary,  
U.S. Department of Homeland Security;**

**THOMAS E. FEELEY,  
in his official capacity as Field Office Director,  
Buffalo Field Office, U.S. Immigration &  
Customs Enforcement; and**

**JEFFREY SEARLS  
in his official capacity as Administrator,  
Buffalo Federal Detention Facility.**

*Respondents.*

**Civil Action No. 1:20-CV-0361**

**MOTION FOR TEMPORARY  
RESTRAINING ORDER**

**NOTICE OF MOTION FOR TEMPORARY RESTRAINING ORDER**

Petitioner, by and through undersigned counsel, hereby move the Court, pursuant to Fed. R. Civ. Proc. 65 and Local Rule 65(b)(2), for a Temporary Restraining Order that they be

immediately released from Respondents' custody. In support of this motion, the petitioner submits:

- (1) A Memorandum of Law in Support of the Motion, with supporting exhibits,
- (2) A Proposed Order granting the Motion for a Temporary Restraining Order.

Undersigned counsel has given notice of the Motion to Assistant United States Attorneys Daniel Moar, Adam Khalil, and David Coriell as required by Local Rule 65(b)(2).

Respectfully submitted,

/s/ Joseph Moravec

JOSEPH MORAVEC, Esq.  
Prisoners' Legal Services of New York  
41 State Street, Suite M112  
Albany, NY 12207  
(518) 694-8699  
jmoravec@plsny.org  
*Attorney for Petitioners*

DATED: March 26, 2020

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK**

**VERNON JONES, MARCKINDAL JULES, LYXON  
CHERY, ALDWIN JUNIOR BRATHWAITE,  
PATRICK MADUABUCHI NWANKWO, DWEEN  
ALFAREL BLACKMAN, RICARDO  
QUINTANILLA-MEJIA, BRIGHT IDADA  
FALODUN, PHILIP DONGA, GAMDUR NARAIN,  
ERIC C. COMMISSIONG, MD. ABU MUSA  
BHUYAN, IBRAHIMA SORY SOW, JUBRIL  
ADELAKOUN, JUAN CARLOS LAINEZ MEJIA,  
CROSWELL WILSON, JONATHAN ESPINAL-  
POLANCO, MARVENS THOMAS,  
SHANTADEWIE RAHMEE, DANILO  
CONCEPCION, OSCAR SALCEDO, CURRY  
WENDELL FORBES, and NECATI HARSIT;**

*Petitioners,*

v.

**CHAD WOLF,  
in his official capacity as Acting Secretary,  
U.S. Department of Homeland Security;**

**THOMAS E. FEELEY,  
in his official capacity as Field Office Director,  
Buffalo Field Office, U.S. Immigration &  
Customs Enforcement; and**

**JEFFREY SEARLS  
in his official capacity as Administrator,  
Buffalo Federal Detention Facility.**

*Respondents.*

**Civil Action No. 1:20-CV-0361**

**PROPOSED ORDER**

**PROPOSED ORDER**

Pending before the Court is Petitioner's Motion for an Temporary Restraining Order.

IT IS HEREBY ORDERED that Petitioner's motion for Temporary Restraining Order is

**GRANTED;** and it is further

ORDERED that on or by Tuesday, March 31, 2020 Respondents must establish appropriate public health measures for the immediate release of Petitioners from their custody; and it is further

ORDERED that on or by Wednesday, April 1, 2020, Respondents shall release Petitioners from their custody on appropriate conditions of supervision.

---

United States District Judge

DATED: \_\_\_\_\_, 2020  
Buffalo, NY