

**IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
OHIO
WESTERN DIVISION**

CARMEN GRACIELA GUERRERO SANDOVAL ex rel

Case No. 2:25-cv-559

CDBG, a minor child

And,

UNBORN CHILD

2525 Bridgestone Drive

Columbus, Ohio 43219-7339

Petitioners

v.

PAM BONDI,

UNITED STATES ATTORNEY GENERAL

Department of Justice

950 Pennsylvania Avenue N. W.

Washington, D. C. 20530-0004

and

KRISTI NOEM

SECRETARY DEPARTMENT OF HOMELAND SECURITY

245 Murray Lane

Washington, D. C. 20528

Respondents

**MOTION FOR TEMPORARY
RESTRAINING ORDER**

Petitioners GDGS and an UNBORN CHILD MOVE THIS Court for an Order in this matter restraining the Department of Justice and the Department of Homeland Security from

removing their mother, Jennifer Moran-Osorio, from the United States until a disposition in his Complaint for Declaratory Judgment has been filed. Their mother is in imminent danger of being removed from the United States and the Plaintiffs herein will suffer damage as stated in his Complaint with no further meaningful recourse. WHEREFORE, Plaintiffs request this Court to order the Defendants to cease any and all activity to summarily remove their mother from the United States until the disposition of their Complaint for Declaratory Judgment has been completed.

Respectfully submitted,

s/ George A. Katchmer

GEORGE A. KATCHMER

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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

A copy of the foregoing was served upon the Defendants via electronic notification by the Clerk of Courts this day of filing.