

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
SAMUEL PENSAMIENTO,)	
)	No. 18-cv-10475
Petitioner,)	
)	
v.)	
)	
JOSEPH D. MCDONALD, JR., ET AL.)	
)	
Respondents.)	
_____)	

**EMERGENCY MOTION FOR WRIT OF HABEAS CORPUS AD PROSEQUENDUM
OR, IN THE ALTERNATIVE, FOR TEMPORARY RESTRAINING ORDER**

Petitioner Samuel Pensamiento is an immigration detainee at the Plymouth County Correctional Facility. Mr. Pensamiento hereby moves for a writ of habeas corpus *ad prosequendum*, or, alternatively, a temporary restraining order, requiring that he be transported to Chelsea District Court on March 19, 2018.

Mr. Pensamiento’s habeas petition seeks additional relief. However, the present motion is limited solely to the issue of securing Mr. Pensamiento’s appearance in Chelsea District Court on March 19, 2018.

As grounds, Mr. Pensamiento refers the Court to the accompanying memorandum in support of this motion, and to the associated declarations and their exhibits.

March 12, 2018

Respectfully submitted,

/s/ Adriana Lafaille

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CERTIFICATE OF SERVICE

This motion is being filed contemporaneously with the associated petition for writ of habeas corpus. No service order has yet issued. I hereby certify that I will immediately send true copies of this Motion and of the associated memorandum and declarations by electronic mail to Rayford A. Farquhar, Chief of Defensive Litigation, Civil Division, U.S. Attorney's Office for the District of Massachusetts.

/s/ Adriana Lafaille
Adriana Lafaille