

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
FLORIDA, FORT MYERS DIVISION

Rogelio Bolufe Izquierdo v. Warden, Alligator Alcatraz

Bolufe Izquierdo · No. 2:26-cv-35-KCD-NPM · Decided February 23, 2026

SUMMARY

The United States District Court for the Middle District of Florida denied Rogelio Bolufe Izquierdo’s emergency motion for injunctive relief against the Warden of Alligator Alcatraz. The court held that the requested injunction was an unenforceable general command to obey the law and that Plaintiff had not shown a likelihood of imminent irreparable harm from retaliation or evidence preservation failures.

CASE DETAILS

COURT	United States District Court for the Middle District of Florida, Fort Myers Division
WRITING FOR THE COURT	Kyle C. Dudek
JURISDICTION	United States District Court, Middle District of Florida, Fort Myers Division
DECIDED	February 23, 2026
DOCKET	2:26-cv-35-KCD-NPM
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff, a civil immigration detainee, moved for emergency injunctive relief to prevent alleged retaliation against him or his witnesses and to require preservation of evidence. The district court denied the motion.
STANDARD OF REVIEW	A preliminary or emergency injunction requires a showing that irreparable harm is likely in the absence of relief; injunctions must also comply with Federal Rule of Civil Procedure 65(d)'s specificity requirements.
PRECEDENTIAL VALUE	unknown
PARTIES	Rogelio Bolufe Izquierdo v. Warden, Alligator Alcatraz

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QUESTIONS PRESENTED

1. Whether the requested injunction satisfied Federal Rule of Civil Procedure 65(d)'s requirement that an injunction specifically state its terms and describe in reasonable detail the acts restrained or required.
2. Whether Plaintiff demonstrated a likelihood of irreparable harm sufficient to warrant emergency injunctive relief.

HOLDINGS

1. An injunction that merely commands a defendant to obey the law, without identifying specific acts to be restrained or required, is impermissibly broad and unenforceable under Rule 65(d).
2. Emergency injunctive relief is unavailable absent a concrete showing that irreparable harm is likely in the absence of an injunction; speculative or merely possible future harm is insufficient.

KEY QUOTATIONS

“Under Federal Rule of Civil Procedure 65(d), an injunction must “state its terms specifically” and “describe in reasonable detail . . . the act or acts restrained or required.””

“Without a concrete showing that irreparable harm is likely, rather than merely possible or speculative, the Court cannot grant this extraordinary relief.”

FACTUAL BACKGROUND

Plaintiff, a civil immigration detainee, alleged severe abuse, coercive confinement, and psychological mistreatment amounting to torture at the Alligator Alcatraz detention facility. He sought an emergency injunction barring retaliation against him or his witnesses and requiring preservation of relevant evidence. He offered no specific facts or evidence showing that retaliation was planned, impending, or otherwise likely.

PROCEDURAL HISTORY

Rogelio Bolufe Izquierdo filed a civil action alleging abuse, coercive confinement, and psychological mistreatment at the Alligator Alcatraz detention facility. He then filed an emergency motion for an injunction. The Middle District of Florida denied the motion because the requested relief was impermissibly broad and because Plaintiff failed to show that future irreparable harm was likely.

DISPOSITION

other

CASES CITED

- SEC v. Goble, 682 F.3d 934, 949 (11th Cir. 2012)
- Burton v. City of Belle Glade, 178 F.3d 1175, 1201 (11th Cir. 1999)
- Winter v. Natural Resources Defense Council, Inc., 555 U.S. 7, 22 (2008)
- City of Los Angeles v. Lyons, 461 U.S. 95, 102 (1983)

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