

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
FLORIDA, JACKSONVILLE DIVISION

Isabella Maryanovsky v. Garret Ripa, et al.

Maryanovsky · No. 3:25-cv-1599-MMH-SJH · Decided January 5, 2026

SUMMARY

The United States District Court for the Middle District of Florida partially granted Isabella Maryanovsky’s emergency motion for a temporary restraining order in her habeas action challenging immigration detention. The court enjoined the respondents from removing Maryanovsky from the Jacksonville Division through January 19, 2026, waived the Rule 65(c) security requirement, and denied relief seeking to enjoin her continued detention. The order also directed service, required respondents’ counsel to appear, and scheduled a status conference.

CASE DETAILS

COURT	United States District Court for the Middle District of Florida, Jacksonville Division
WRITING FOR THE COURT	Marcia Morales Howard
JURISDICTION	United States District Court for the Middle District of Florida, Jacksonville Division
DECIDED	January 5, 2026
DOCKET	3:25-cv-1599-MMH-SJH
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner, an immigration detainee challenging her detention through a petition for writ of habeas corpus, moved for an emergency temporary restraining order barring Respondents from transferring or removing her outside the Middle District of Florida and from continuing her detention.
STANDARD OF REVIEW	To obtain injunctive relief, the movant must clearly establish a substantial likelihood of success on the merits, irreparable injury absent relief, that the threatened injury outweighs any harm the injunction may cause the opposing party, and that the injunction is not adverse to the public interest. When the government opposes the injunction, the third and fourth factors merge.

PRECEDENTIAL VALUE	unpublished district court temporary restraining order; persuasive at most
PARTIES	Isabella Maryanovsky v. Garret Ripa, et al.

TOPICS

immigration detention injunctions removal proceedings due process civil procedure

PRACTICE AREAS

immigration law federal habeas corpus injunctive relief civil procedure due process

QUESTIONS PRESENTED

1. Whether Maryanovsky was entitled to a temporary restraining order preserving the status quo by preventing Respondents from removing or transferring her outside the Jacksonville Division of the Middle District of Florida.
2. Whether the court should enjoin Respondents from continuing to detain Maryanovsky or require her release or reinstatement of her prior Order of Supervision.
3. Whether the court should waive the security requirement under Federal Rule of Civil Procedure 65(c).

HOLDINGS

1. A temporary restraining order was warranted to preserve the status quo because removal from the court's jurisdiction could effectively foreclose judicial recourse while the habeas action was pending.
2. The court denied the request to enjoin Respondents from continuing to detain Maryanovsky and declined to grant the requested substantive release-related relief through the temporary restraining order.
3. The court waived the Rule 65(c) security requirement because there was no realistic likelihood of prejudice to Respondents from the limited restraint.

KEY QUOTATIONS

“Injunctive relief, whether in the form of a temporary restraining order or a preliminary injunction, “is an extraordinary and drastic remedy.”” (2)

“One inherent characteristic of a temporary restraining order is that it has the effect of merely preserving the status quo[.]” (3)

“Notably, temporary restraining orders are meant to “preserv[e] the status quo rather than grant[] most or all of the substantive relief requested in the complaint.”” (4)

FACTUAL BACKGROUND

Isabella Maryanovsky, a Ukrainian-born former citizen of the USSR, was subject to a final order of removal. After her removal could not be effectuated within the statutory removal period, ICE released her under an Order

of Supervision in September 2009. ICE allegedly re-detained her on December 15, 2025, and she claimed that Ukraine did not recognize her as a citizen, making removal not reasonably foreseeable, and that she was denied notice and an opportunity to contest the re-detention. She sought habeas and injunctive relief, including protection from transfer outside the court's jurisdiction.

PROCEDURAL HISTORY

Maryanovsky filed a petition for writ of habeas corpus and, more than a week later, filed an emergency motion for a temporary restraining order. The district court granted the motion in part, enjoining Respondents from removing her from the Jacksonville Division through January 19, 2026, waived the Rule 65(c) security requirement, and denied the request to enjoin her continued detention.

DISPOSITION

other

CASES CITED

- *Zadvydas v. Davis*, 533 U.S. 678 (2001)
- *Wreal, LLC v. Amazon.com, Inc.*, 840 F.3d 1244, 1247 (11th Cir. 2016)
- *Siegel v. LePore*, 234 F.3d 1163, 1176 (11th Cir. 2000)
- *Citizens for Police Accountability Political Comm. v. Browning*, 572 F.3d 1213, 1217 (11th Cir. 2009) (per curiam)
- *Keister v. Bell*, 879 F.3d 1282, 1287-88 (11th Cir. 2018)
- *Gonzalez v. Governor of Georgia*, 978 F.3d 1266, 1271 (11th Cir. 2020)
- *McDonald's Corp. v. Robertson*, 147 F.3d 1301, 1306 (11th Cir. 1998)
- *Fernandez-Roque v. Smith*, 671 F.2d 426, 429 (11th Cir. 1982)
- *Ajugwe v. Noem*, No. 8:25-CV-982-MSS-AEP, 2025 WL 1370212, at *10 (M.D. Fla. May 12, 2025)