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**FILED**

AUG 08 2024

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EASTERN DISTRICT OF CALIFORNIA  
BY *[Signature]*  
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UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

Sokhean keo  
[Full Name]

(A# 027-35-1321)

Petitioner,

v.

Warden of the Mesa Verde ICE Processing Center, Current or Acting Field Office Director, San Francisco Field Office, United States Immigration and Customs Enforcement; Current or Acting Secretary, United States Department of Homeland Security; and Current or Acting United States Attorney General,

Respondents.

Case No. 1:24-cv-00919-HBK (HC)

**PETITIONER'S MOTION FOR A TEMPORARY RESTRAINING ORDER**

Sokhean keo (petitioner) hereby files this motion for a Temporary Restraining Order (TRO) to enjoin Respondents from detaining unlawfully. Petitioner has been in custody of Immigration and Customs Enforcement (ICE) since January 6, 2023, for approximately one year and 8 months. Petitioner has never been afforded a bond hearing. Petitioner prolonged detention amounts to a violation of the Fifth and Eighth Amendment rights.

1. Pursuant to Fed. R. Civ. P. 65, Petitioner seeks a Temporary Restraining Order that requires Respondents to immediately release him from custody.

2. Petitioner requests a Temporary Restraining Order requiring Respondents to provide petitioner with a bond hearing before a neutral decisionmaker.
3. Petitioner also requests the court schedule oral argument as soon as the court's calendar allows.

WHEREFORE, for the reasons set forth in the accompanying brief, Petitioner respectfully requests this court to grant the Temporary Restraining Order and set the case for further briefing.

**RESPECTFULLY SUBMITTED this 6<sup>th</sup> day of August, 2024**

Sokhean keo

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