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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

Jesus Domingo-Ros,	)	CASE NO.: <u>'25CV1208 DMS DEB</u>
Yoni Jacinto Garcia, and	)	
Edwin Juarez-Cobon,	)	
	)	
Petitioners-Plaintiffs,	)	
	)	PETITIONERS' APPLICATION
v.	)	FOR TEMPORARY RESTRAINING
	)	ORDER AND ORDER TO SHOW CAUSE
Gregory J. Archambeault,	)	
San Diego Field Office	)	
Director, Immigration and	)	
Customs Enforcement,	)	
Enforcement and Removal	)	
Operations, and	)	
	)	
Jeremy Casey, Warden,	)	
Imperial Regional Detention	)	
Facility, Calexico, California	)	
	)	
Respondents-Defendants.	)	

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1 Pursuant to Rule 65(b) of the Federal Rules of Civil Procedure, Petitioners  
2 Jesus Domingo-Ros, Yoni Jacinto Garcia, and Edwin Juarez-Cobon hereby move  
3 the Court for emergency relief in the form of a temporary restraining order  
4 enjoining the Respondents from removing Petitioners from the United States and  
5 from relocating Petitioners outside of the Southern District of California pending  
6 further Order of the Court.

7 Petitioners further move for the issuance of an order to show cause as to why  
8 a preliminary injunction should not issue.

9 This application is supported by the Memorandum of Points and Authorities,  
10 accompanying exhibits, as well as any additional submissions that may be  
11 considered by the Court.

12  
13 Dated: May 12, 2025

Respectfully submitted,

14 s/ Niels W. Frenzen  
15 NIELS W. FRENZEN  
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Attorney for Petitioners

**CERTIFICATE OF COUNSEL**

Pursuant to Rule 65(b)(1)(B) of the Federal Rules of Civil Procedure, I hereby certify that on May 11, 2025 at approximately 10:45 PM, I emailed AUSAs Caroline Prime and Erin Dimbleby to ask who the appropriate person to notify regarding the filing of a TRO application was. On May 12, 2025 at approximately 9:30 AM, Ms. Prime responded and advised me that Mary Wiggins was the Civil Docketing Clerk. At approximately 10:45 AM on May 12, 2025, I provided a copy of the Application for a Temporary Restraining Order, supporting exhibits, Memorandum of Points and Authorities, and Petition for Writ of Habeas Corpus to Ms. Wiggins by emailing copies to Mary.Wiggins@usdoj.gov.

Dated: May 12, 2025

Respectfully submitted,

s/ Niels W. Frenzen  
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Attorney for Petitioners

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 12, 2025, I served a copy of this Application for TRO and OSC by email to the following individual:

Mary Wiggins  
Civil Docketing Clerk  
U S Attorney's Office  
880 Front Street, Suite 6293, San Diego, CA 92101  
Email: Mary.Wiggins@usdoj.gov

s/ Niels W. Frenzen

Niels W. Frenzen

Counsel for Petitioners