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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Leonel Navarrete Hernandez,)	CASE NO.: _____
)	
Petitioner-Plaintiff,)	
)	PETITIONER'S EX PARTE APPLICATION
v.)	FOR TEMPORARY RESTRAINING
)	ORDER AND ORDER TO SHOW CAUSE
Todd Lyons, Acting Director)	
Immigration and Customs)	
Enforcement;)	
)	
and)	
)	
Ernesto Santacruz, Jr.,)	
Los Angeles Field Office)	
Acting Director, Immigration)	
and Customs Enforcement,)	
Enforcement and Removal)	
Operations, and)	
)	
)	
Respondents-Defendants.)	
_____)	

1 Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure, Petitioner
2 Leonel Navarrete Hernandez hereby moves the Court for emergency relief in the
3 form of a temporary restraining order directing Respondents to immediately release
4 Petitioner from their custody and enjoining the Respondents from removing
5 Petitioner from the United States or relocating Petitioner outside of the Central
6 District of California pending further Order of the Court.

7 Petitioner further moves 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: June 13, 2025

Respectfully submitted,

14 s/ Jean Reisz
15 JEAN REISZ
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Attorney for Petitioner

CERTIFICATE OF COUNSEL

Pursuant to Rule 65(b)(1)(B) of the Federal Rules of Civil Procedure and L.R. 65-1, I hereby certify that on June 13, 2025 at approximately 11:00 AM, I emailed David M. Harris, Chief of the Civil Division, U.S. Attorney's Office, Central District of California. 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 Mr. Harris by emailing copies to David.M.Harris@usdoj.gov.

Dated: June 13, 2025

Respectfully submitted,

s/ Jean Reisz
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Attorney for Petitioner

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 13, 2025, I served a copy of this Application for TRO and OSC by email to the following individual:

David M. Harris
Chief of the Civil Division
U.S. Attorney's Office
300 N. Los Angeles St., Ste. 7516
Los Angeles, CA 90012-3341
Email: David.M.Harris@usdoj.gov

s/ Jean Reisz

Jean Reisz

Counsel for Petitioner