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

13 Leonel Navarrete Hernandez,) CASE NO.: 2:25-cv-05376-FWS-SK
14)
15 Petitioner-Plaintiff,)
16)
17 v.) PETITIONER'S RENEWED EX PARTE
18) APPLICATION FOR TEMPORARY
19) RESTRAINING ORDER
20 Todd Lyons, Acting Director)
21 Immigration and Customs)
22 Enforcement;)
23)
24 and)
25)
26 Ernesto Santacruz, Jr.,)
27 Los Angeles Field Office)
28 Acting Director, Immigration)
and Customs Enforcement,)
Enforcement and Removal)
Operations, and)
Respondents-Defendants.)
_____)

1 In light of Petitioner's now confirmed transfer to the ICE El Paso Processing
2 Center in Texas from the Santa Ana, California ICE ERO facility and in light of the
3 risk of removal from the United States and the threat to Petitioner's life should he
4 be removed, pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure,
5 Petitioner Leonel Navarrete Hernandez renews his request for emergency relief in
6 the form of a temporary restraining order enjoining Respondents from removing
7 Petitioner from the United States.¹

8 Petitioner requests issuance of a temporary restraining order enjoining his
9 removal until June 18, 2025 when the Court will conduct a hearing in this case with
10 more complete briefing.

11 The Respondents' position on this renewed application is that the issues can
12 be adequately addressed within the briefing schedule set by the Court for
13 Petitioner's previously filed and pending TRO Application.

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

17
18 Dated: June 14, 2025

Respectfully submitted,

19 s/ Jean Reisz
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Attorney for Petitioner

26 ¹ Petitioner is not now seeking an order directing Respondents to immediately
27 release Petitioner from their custody in this renewed application for emergency
28 relief. Petitioner is seeking that relief pursuant to the previously filed TRO
application.

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 14, 2025 at approximately 11:00 AM, my co-counsel Niels Frenzen emailed counsel for Respondents, AUSA Randy Hsieh, and subsequently had a telephone conversation with Mr. Hsieh and advised him of this filing. I provided a copy of the Renewed Application for a Temporary Restraining Order, supporting exhibit, and Memorandum of Points and Authorities by emailing copies to Randy.Hsieh@usdoj.gov.

Dated: June 14, 2025

Respectfully submitted,

s/ Jean Reisz
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Attorney for Petitioner

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 14, 2025, I served a copy of this Renewed Application for TRO by email to the following individual:

Randy Hsieh
Assistant U.S. Attorney
U.S. Attorney's Office
300 N. Los Angeles St., Ste. 7516
Los Angeles, CA 90012
Email: Randy.Hsieh@usdoj.gov

s/ Jean Reisz
Jean Reisz
Counsel for Petitioner