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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

Pedro VASQUEZ PERDOMO, *et al.*,

Plaintiffs,

v.

Kristi NOEM, in her official capacity as Secretary, Department of Homeland Security, *et al.*,

Defendants.

Case No.: 2:25-cv-05605-MEMF-SP

PLAINTIFFS COALITION FOR HUMANE IMMIGRANT RIGHTS AND IMMIGRANT DEFENDERS LAW CENTER'S REPLY IN SUPPORT OF *EX PARTE* APPLICATION FOR TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE RE: PRELIMINARY INJUNCTION

Hon. Maame Ewusi-Mensah Frimpong

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PRELIMINARY STATEMENT

Defendants insist that they are upholding the right to counsel by implementing the very legal visiting schedule that Plaintiffs CHIRLA and ImmDef have requested in their TRO. But in the next breath, Defendants decry that requested relief as hindering their ability to protect against "violence and property damage," and threatening President Trump's ability to achieve his deportation objectives. Defendants also insist that the situation at B-18 has now "normalized" so that there is no need to worry about future constitutional violations. But the circumstances that Defendants cite as having justified restrictions on access to counsel in June are the same circumstances that Defendants have used to keep military troops in Los Angeles in July.

CHIRLA and ImmDef's submissions—misconstrued but ultimately unrefuted by Defendants—show that a TRO is warranted. CHIRLA and ImmDef are likely to succeed on the merits because they have organizational standing to raise their claims, and the cumulative effect of Defendants' access restrictions easily amounts to a constitutional violation, no matter the vague security concerns at which Defendants wave their hands. CHIRLA and ImmDef face ongoing, irreparable harm, which gives them standing to seek injunctive relief. And all the equities favor granting the modest TRO they have proposed.

ARGUMENT

I. Defendants' Procedural Complaint Provides No Basis to Deny a TRO

Defendants first argue that the Court should reject this application because the way it was presented represents a "threat to the administration of justice." ECF 70 ("Opp.") at 7 (quoting *Mission Power Engin'g Co. v. Continental Cas. Co.*, 883 F. Supp. 488, 490 (C.D. Cal. 1995)). The case on which Defendants rely, however, concerned lawyers' efforts to seek workaday judicial action "outside the framework of the rules." *Mission Power*, 883 F. Supp. at 490. It did not discuss TRO proceedings, which, by their very nature, are fast-moving and reflect one of the few places where the Federal Rules permit a court to grant relief with no notice to the other side. Fed. R. Civ. P. 65(b)(1). Here, of course, Defendants did receive notice as well as their requested briefing schedule. *See* ECF 40 at 1; ECF 42.

In any event, nothing in *Mission Power* bars consideration of CHIRLA and ImmDef's application. *Ex parte* relief is permissible where (1) irreparable harm will occur if a matter is heard via "a noticed motion on the usual briefing schedule" and (2) the party seeking relief "did not create the state of affairs that necessitates ex parte relief." *Barden v. W. Ref. Retail, LLC*, No. 23 Civ. 01360, 2024 WL 4868288, at *1 (C.D. Cal. Sept. 11, 2024). The first element is satisfied for the same reasons that CHIRLA and ImmDef satisfy the irreparable harm requirement applicable to all TROs, ECF 38 ("TRO App.") at 11–12; *infra* at 6–9, and Defendants point to no authority that would support delaying this matter 28 days to hold a noticed hearing, *see* L.R. 6-1. The second element is satisfied for the obvious reason that CHIRLA and ImmDef did not create the constitutional crisis that gives rise to their claims. Although Defendants suggest that Plaintiffs delayed in filing suit, Defendants confuse general awareness of unconstitutional conduct (which Defendants themselves understood from public reporting, individual complaints, and inquiries by other government officials) with the ability of counsel to notice a motion for an injunction (which requires knowledge of specific claims made on behalf of specific plaintiffs, armed with a complaint that meets the applicable pleading standards).

Finally, Defendants complain about the "highly anomalous procedural status of this case." Opp. 8. But it is not unusual for multiple parties to raise the same claims as part of a single action (as occurred when the original parties amended the complaint and were joined by others raising identical Fourth Amendment issues), nor is it unusual for a single party to bring multiple claims at the same time (as CHIRLA has done in raising claims under the Fourth and Fifth Amendments). Had each Plaintiff here brought their own suit—and had CHIRLA divided its claims between two separate suits—Defendants surely would have cried prejudice from having to oppose TROs in half a dozen or more separate actions simultaneously. Regardless, whatever anomaly they might perceive, Defendants have not cited any basis to deny a TRO due to the "procedural status" of this case.

II. Plaintiffs Are Likely to Succeed on the Merits

Defendants raise a handful of arguments bearing on the likelihood of success on the

merits. All fall short.

First, Defendants argue that CHIRLA and ImmDef are entirely without standing in this action. Opp. 10–15. Defendants dedicate much of their opposition to responding to third-party, next-friend, and associational standing arguments that CHIRLA and ImmDef have not made in connection with their application. *Compare id.*, *with* TRO App. 11–12. And Defendants' limited discussion of organizational standing, interspersed among discussion of other standing theories, misses the mark in several ways. Defendants do not challenge the facts underlying CHIRLA's and ImmDef's organizational standing, but rather insist that impeding the organizations' "ability to engage in their mission of representing immigrants and refugees … is insufficient to establish standing." Opp. 10. A long line of cases says otherwise. *E.g.*, *Havens Realty Corp. v. Coleman*, 455 U.S. 363 (1982); *Fellowship of Christian Athletes v. S.J. Unified Sch. Dist. Bd. of Educ.*, 82 F.4th 664, 682–83 (9th Cir. 2023) (*en banc*); *E. Bay Sanctuary Covenant v. Trump*, 932 F.3d 742, 765 (9th Cir. 2018) (standing where government actions "perceptibly impaired [the organization plaintiffs'] ability to provide the services [they were] formed to provide"). Defendants seek to write off that body of precedent by labeling *Havens Realty* an "unusual case." Opp. 10 n.7 (quoting *FDA v. All. for Hippocratic Med.*, 602 U.S. 367, 396 (2024)). But the Supreme Court in *Alliance* confirmed that organizations have standing under *Havens Realty* where the defendant's actions "directly affect[] and interfere[]" with "core business activities," and it merely cautioned that a party "cannot spend its way into standing simply by expending money to gather information and advocate against the defendant's action." 602 U.S. at 394–95. This case easily fits within the *Havens Realty* framework. *See* TRO App. 11–12; Toczylowski Supp. Decl. ¶ 19; Salas Supp. Decl. ¶ 3.

Second, Defendants argue that CHIRLA and ImmDef have not shown that detainees were deprived of the Fifth Amendment right of access to counsel. But Defendants admit that B-18 was entirely closed to legal visits on multiple occasions in the weeks leading up to this action. Opp. 4. And they do not dispute the countless other ways in which access to counsel was limited even when B-18 was nominally open, from long delays to arbitrary

denials of entry, from misrepresentations about the presence of specific detainees to the lack of privacy necessary to conduct legal consultations. TRO App. 8–9.

Instead, Defendants insist that such restrictions were not "punitive or excessive," and the limited access that was eventually provided to some detainees was enough to satisfy the Constitution. Opp. 16–17. But the test is not whether there was some modicum of legal access; it is whether the cumulative effect of Defendants' restrictions deny reasonable access to counsel. In *Orantes-Hernandez v. Thornburgh*, for instance, the Ninth Circuit found such a cumulative effect where there were limited attorney visitation hours, long delays in connecting detainees to counsel, inadequate systems to communicate with detainees, and inadequate efforts to ensure confidentiality of in-person and telephonic attorney meetings. 919 F.2d 549, 565 (9th Cir. 1990); *see also Torres v. U.S. Dep't of Homeland Sec.*, 411 F. Supp. 3d 1036, 1060 (C.D. Cal. 2019) (finding violation where there were restrictions on telephone access, legal mail, and in-person meetings); *Innovation L. Lab v. Nielsen*, 310 F. Supp. 3d 1150, 1162 (D. Or. 2018) (same where there were limitations on access to facility to meet with clients, along with conflicting instructions on legal visitation hours). Those cases reflect the exact circumstances present here.

If anything, the same access restrictions at B-18 are even more injurious than they would be if imposed at a longer-term detention facility. Individuals arrive at B-18 at a critical time in the immigration process, and the dire conditions of confinement put pressure on detainees who may be asked to waive rights without ever having the opportunity to consult with counsel. *See* TRO App. 10; *see also* Toczylowski Supp. Decl. ¶ 13 (describing detainee who, on June 27, "opted for voluntary removal because he could no longer take the conditions in B-18"). Those rights include the right to raise suppression challenges that, by virtue of Defendants' pattern and practice of suspicionless stops, *see* ECF 45–ECF 45-21, may be available to almost all B-18 detainees. *See Sanchez v. Sessions*, 904 F.3d 643, 649 (9th Cir. 2018); *cf. Maine v. Moulton*, 474 U.S. 159, 170 (1985) (to "deprive a person of counsel during the period prior to trial may be more damaging than denial of counsel during the trial itself," because what happens at the "earlier, 'critical'

stages … might well settle the accused's fate"). To "infuse the critical right to counsel with meaning," *Biwot v. Gonzales*, 403 F.3d 1094, 1098 (9th Cir. 2005), the unique circumstances facing detainees at B-18 cannot be ignored.

Defendants try to make up for the limitations on in-person access by repeatedly stating that B-18 detainees have 24/7 access to phones. Opp. 2–3, 5, 16–17. But "a healthy counsel relationship in the immigration context requires confidential in-person visitation, especially where an immigrant must be forthcoming about sensitive matters such as past trauma, mental health issues, and criminal history," *Arroyo v. U.S. Dep't of Homeland Sec.*, No. 19 Civ. 815, 2019 WL 2912848, at *17 (C.D. Cal. June 20, 2019), meaning telephonic legal access alone will not suffice. And the telephonic access that Defendants highlight is woefully deficient. The phones Defendants describe are in an open holding room, currently overcrowded with detainees, making it impossible to make a legal call privately or with sufficient time for meaningful consultation. TRO App. 4; *see Orantes-Hernandez v. Holder*, 321 F. App'x 625, 629 (9th Cir. 2009) (upholding injunction requiring one telephone per twenty-five detainees). And Defendants do not even pretend that these calls are unmonitored by Defendants themselves. *E.g.*, Opp. 2–3; *see* Toczylowski Supp. Decl. ¶ 17; Barba Supp. Decl. ¶ 5.

Third, Defendants argue that "[e]ven if [Plaintiffs] could show there was a rights violation," the limitations on access to counsel would be excused because of Defendants' security concerns. Opp. 2, 17–18. To be sure, a detention facility need not be blind to security considerations while facilitating the access to counsel that the Constitution requires. But simply invoking "security" does not justify whatever restrictions Defendants might impose, and "the constitutional limitations safeguarding essential liberties [ ] remain vibrant even in times of security concerns." *Hamdi v. Rumsfeld*, 542 U.S. 507, 539 (2004); *see Bell v. Wolfish*, 441 U.S. 520, 547 (1979). Here, the security concerns to which Defendants vaguely refer involve protests not in B-18 itself, but throughout the Southern California region. Uyeda Decl. ¶¶ 10–11. This is hardly the sort of institutional security justifications considered in Defendants' cited authorities. *See Florence v. Bd. of Chosen*

Freeholders of Cnty. of Burlington, 566 U.S. 318, 328 (2012) (considering security justification in keeping contraband out of facilities in permitting strip searches upon entry); *Hatim v. Obama*, 760 F.3d 54, 59 (D.C. Cir. 2014) (same). And Defendants do not even try to link specific concerns inside B-18 to the array of actions that they have taken that cumulatively violate the right to retain and consult with counsel.

Fourth, Defendants argue that CHIRLA and ImmDef fail to make out a due process claim because they "do not identify a liberty interest, nor establish error or prejudice." Opp. 18. But this is a red herring. B-18 detainees, as Defendants acknowledge, "have the right to retain counsel." *Id.*; *see also, e.g.*, *Orantes-Hernandez*, 919 F.2d at 565–66. CHIRLA and ImmDef—organizations with standing to challenge Defendants' unconstitutional access restrictions—do not need to identify a liberty interest of their own to establish that Defendants have violated the Fifth Amendment rights of detainees. *E.g.*, *Defs. of N.Y., Inc. v. Fed. Bureau of Prisons*, 954 F.3d 118, 126–27 (2d Cir. 2020) (public defender service suffered injury from interference with clients' right to counsel); *see also Sierra Club v. Trump*, 929 F.3d 670, 700 (9th Cir. 2019) ("We are doubtful that a zone of interests test applies to Plaintiffs' equitable cause of action."). Nor do Plaintiffs need to establish prejudice, a showing required in some circuits, if at all, when seeking review of an immigration judge's decision in a removal proceeding—not when seeking to enjoin ongoing unconstitutional conduct. *See Torres*, 411 F. Supp. 3d at 1062 (rejecting argument that plaintiffs had to allege prejudice where challenging restrictions to legal access).

III. Plaintiffs Face a Likelihood of Continuing Harm

Defendants argue that because "[o]perations at B-18 normalized on June 24," and "Plaintiffs have not alleged that they have been unable to access existing or potential clients at B-18 since then," CHIRLA and ImmDef cannot show a likelihood of future harm and have no standing to seek injunctive relief. Opp. 9, 19. Defendants are wrong at both turns.

CHIRLA and ImmDef proffer significant evidence that Defendants have been engaged in systemic and ongoing activities that limit attorneys from visiting and communicating with current and prospective clients at B-18—and not simply imposing

one-off access restrictions in connection with temporary security concerns. *See* TRO App. 7–12. This evidence includes detailed declarations from CHIRLA's executive director, ImmDef's president, and multiple CHIRLA and ImmDef attorneys, which document the various ways Defendants have denied and continue to deny reasonable access to counsel at B-18. *See, e.g.,* Salas Decl. ¶ 33 (explaining, as of July 1, that "access to detainees at B-18 has been sporadic and ineffective"); Toczylowski Decl. ¶¶ 54, 56 (explaining, as of July 1, that "ImmDef attorneys have consistently had difficulty locating individuals we believe are being held at B-18," and that "conditions at the facility have hampered attorneys' ability to provide meaningful representation and constrained attorney-client relationships").

Meanwhile, Defendants' rosy depiction of attorney access to detainees held at B-18 after June 24, when Defendants purport to have "reinstated" access, is contradicted by the uncontroverted factual record. Opp. 11. A declaration by the ImmDef president, cited throughout the TRO application, describes an attorney's difficulty in gaining access to B-18 in the face of arbitrary obstruction by a detention officer on June 27—three days after Defendants claim that legal visitation returned to "normal." Toczylowski Decl. ¶¶ 51–53. On that day, the ImmDef attorney was originally denied access to the facility for failing to present a physical bar card and, after a lengthy delay in entering the facility, was provided a mere 10 minutes to visit with a client in a non-confidential setting. *Id.*

Further declarations submitted in connection with this reply confirm that the obstacles to access persist after June 24. Detention officers have continued to tell attorneys that the facility is closed, even during purportedly normal visiting hours, Steele Decl. ¶ 6 (June 29 visit); continued to refuse to answer questions about whether clients are detained at B-18 or failed to confirm where they have been transferred, Toczylowski Supp. Decl. ¶ 5 (July 2 visit); *id.* ¶ 7 (July 3 visit); *id.* ¶ 8 (July 8 visit); Thompson-Lleras Supp. Decl. ¶¶ 15 (July 8 visit); continued to deny or delay attorneys' requests to locate or meet with clients without an A-number, even though individuals not previously subject to immigration proceedings would not have had an A-number until arriving at the facility, Toczylowski Supp. Decl. ¶ 15 (July 3); Thompson-Lleras Supp. Decl. ¶¶ 16 (July 8 visit).

Upon arriving at B-18 to meet with clients, attorneys continue to discover that they have already been transferred to other facilities, both inside and outside the state, in some cases before having the opportunity to meet with counsel. Toczylowski Supp. Decl. ¶¶ 8–9; Thompson-Lleras Supp. Decl. ¶¶ 14–15; Steele Decl. ¶¶ 4–5; Duran Supp. Decl. ¶¶ 2–3. And detainees continue to be deprived of confidential legal phone calls with attorneys, continue to be asked to sign documents without an opportunity to speak to an attorney, and are not informed of their right to speak to an attorney. Toczylowski Supp. Decl. ¶¶ 16–19; *see generally* Salas Supp. Decl. ¶¶ 2–3 (explaining that "CHIRLA and like organizations have continued to experience unprecedented impediments to accessing existing and potential clients").

Moreover, there is no reason why the justification that Defendants offer for restricting legal access in the month of June will not apply in July. Defendants invoke generalized security concerns about officer, detainee, and visitor safety resulting from protest activity in the Los Angeles area as cause for shutting down access entirely and repeatedly shuttling detainees back and forth between B-18 and a facility in Santa Ana. *See* Opp. 3. In Defendants' telling, the situation was "so severe" as to require calling up the California National Guard. *Id.* But similar conditions exist to this day, providing Defendants with boundless authority—under Defendants' view of the law—to impose the same access restrictions moving forward. Protest activity remains ongoing and has continued on a near-daily basis since Defendants' mass deportation efforts commenced,[1] and military personnel remain deployed across Los Angeles and surrounding areas.[2]

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[1] Alene Tchekmedyian & Caroline Petrow-Cohen, *Hundreds Rally on July 4 Against Immigration Raids, Budget Bill in Downtown L.A.*, L.A. Times (July 4, 2025), https://www.latimes.com/california/story/2025-07-04/july-4-rally.

[2] Luke Barr & Anne Flaherty, *U.S. Troops on the Ground in LA Immigration Enforcement Operation, DOD Says*, ABC News (July 7, 2025), https://abcnews.go.com/Politics/us-troops-ground-la-immigration-enforcement-operation-dod/story?id=123542308.

This record of systematic, continuing violations is more than sufficient to establish CHIRLA's and ImmDef's standing to seek injunctive relief against the threat of prospective constitutional harm, and to show the likelihood of future irreparable harm. *See Immigrant Defs. L. Ctr. v. Noem*, No. 20 Civ. 9893, 2025 WL 1172442, at *22–24 (C.D. Cal. Apr. 16, 2025); *see also O'Shea v. Littleton*, 414 U.S. 488, 496 (1974) ("[P]ast wrongs are evidence bearing on whether there is a real and immediate threat of repeated injury.").

IV. Defendants' Remaining Arguments Come Up Short

As to the balance of the equities and the public interest, Defendants argue that "the government has a legitimate and significant interest in ensuring that immigration laws are enforced," but nowhere do they explain how upholding the right to counsel—through a modest legal visiting schedule and confidential legal telephone calls—"severely infringe[s] on" their ability to enforce those laws. Opp. 20; *see, e.g.*, U.S. Immigration and Customs Enforcement, National Detention Standards at 65, 166 (2025) (requiring facilities to "permit legal visitation seven days a week, including holidays," and to permit "[a]ll detainees, including those in disciplinary segregation, … to place calls to attorneys"). If anything, Defendants' insistence that President Trump's immigration agenda depends on their ability to restrict access to counsel brings into focus the constitutional crisis unfolding at B-18 and underscores the importance of CHIRLA and ImmDef's requested relief. *See Melendres v. Arpaio*, 695 F.3d 990, 1002 (9th Cir. 2012) ("[I]t is always in the public interest to prevent the violation of a party's constitutional rights.").

As to the bond requirement of Rule 65(c), Defendants ignore the on-point, in-Circuit caselaw explaining why no bond is warranted in these circumstances. *See* TRO App. 13–14. The single D.C. Circuit case they cite, which concerned the performance of a government procurement contract, does nothing to change the analysis. *See* Opp. 21 (citing *DSE, Inc. v. United States*, 169 F.3d 21, 33 (D.C. Cir. 1999)).

As to the scope of the TRO, Defendants invoke the recent decision in *Trump v. CASA, Inc.*, 606 U.S. ---, 2025 WL 1773631 (June 27, 2025), to argue that relief "should apply *only* as to Plaintiffs ImmDef and CHIRLA." Opp' 21. Plaintiffs, of course, are not

requesting anything close to the sort of "universal injunction" at issue in *CASA*, 2025 WL 1773631, at *4, and Defendants do not explain how a daily legal visiting schedule or the availability of a telephone for confidential legal calls could, practically speaking, be parceled out on an attorney-by-attorney basis. Indeed, "[c]rafting [an] injunction is an exercise of discretion and judgment," *Trump v. Int'l Refugee Assistance Project*, 582 U.S. 571, 579 (2017), and an injunction should be as broad as "necessary to give prevailing parties the relief to which they are entitled," *E. Bay Sanctuary Covenant v. Biden*, 993 F.3d 640, 680 (9th Cir. 2021). There is "no general requirement that an injunction affect only the parties in the suit," *id.*, and it is common that the relief necessary to remedy one party's injury will have "the practical effect of benefiting nonparties," *CASA*, 2025 WL 1773631, at *11 (emphasis omitted). CHIRLA and ImmDef's proposed relief is tailored to address the irreparable harm they continue to suffer.

Finally, Defendants request that the Court stay any injunctive relief "for a period of seven days to allow the Solicitor General to determine whether to appeal and seek a stay pending appeal." Opp. 21. Defendants are wrong to presume that granting CHIRLA and ImmDef's application for a TRO will result in an appealable order, especially if the TRO is of limited duration and there is ongoing discovery into Defendants' broad factual assertions prior to a preliminary injunction hearing. *See, e.g.*, *Cmty. Legal Servs. in E. Palo Alto v. U.S. Dep't of Health & Hum. Servs.*, No. 25-2358, 2025 WL 1189827, at *1 (9th Cir. Apr. 18, 2025) (dismissing government's appeal of TRO); *Washington v. Trump*, 847 F.3d 1151, 1158 (9th Cir. 2017) (allowing appeal where TRO "has no expiration date" and "no hearing [on preliminary injunction] has been scheduled"). Regardless, a losing party does not get a stay as a matter of right, and Defendants have not even attempted to show their entitlement to one. *See Nken v. Holder*, 556 U.S. 418, 433 (2009).

CONCLUSION

For all the reasons set forth above and in CHIRLA and ImmDef's opening brief, the Court should enter the requested TRO.

Dated: July 9, 2025

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