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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF EASTERN CALIFORNIA

GUSTAVO QUIROZ,

Petitioner,

vs.

KRISTI NOEM Secretary of U.S.
Department of Homeland Security;
TODD M. LYONS, Acting Director of
U.S. Immigration and Customs
Enforcement; Polly Kaiser, Deputy
Director of U.S. Immigration and
Customs Enforcement; TONYA
ANDREWS, Facility
Administrator/Warden Golden State
Annex, and Pamela Bondi

Respondents

Case No.:

EX PARTE APPLICATION FOR
TEMPORARY RESTRAINING
ORDER AND ORDER TO SHOW
CAUSE

Pursuant to Rule 65(b) of the Federal Rules of Civil Procedure and Local Rule 65-1, Petitioner GUSTAVO QUIROZ moves this Court for emergency relief in the form of a temporary restraining order directing that he be immediately released from immigration custody and his current confinement at the GOLDEN STATE ANNEX FACILITY (controlled by the GEO group). We also move this Court from relocating Mr. QUIROZ out of California pending further order by this Court. This Application and accompanying Memorandum of Points and Authorities, Petition for Writ of Habeas Corpus, Declaration and Exhibits filed contemporaneously

Dated: June 23, 2025,

Respectfully Submitted,

/s/ Emily L. Robinson

Emily L. Robinson
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 20, 2025, this was filed in the Eastern District of California, which effectuates service on the U.S. Attorney's Office. No other service necessary.

Dated: June 23, 2025,

Respectfully Submitted,

/s/ Emily L. Robinson

Emily L. Robinson
Attorney for Petitioner