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

Lazaro MALDONADO BAUTISTA;  
Ananias PASQUAL;  
Ana FRANCO GALDAMEZ;  
Luiz Alberto DE AQUINO DE  
AQUINO,

Petitioners,

v.

Ernesto SANTACRUZ JR., Acting  
Director, Los Angeles Field Office,  
Immigration and Customs Enforcement,  
Enforcement and Removal Operations;  
Todd LYONS, Acting Director, Immigration  
and Customs Enforcement;  
Kristi NOEM, Secretary, U.S.  
Department of Homeland Security;  
Pamela BONDI, U.S. Attorney General;  
Fereti SEMAIA, Warden, Adelanto ICE  
Processing Center,

Respondents.

Case No. 5:25-cv-1873

**PETITIONER'S EX PARTE  
APPLICATION FOR  
TEMPORARY RESTRAINING  
ORDER AND ORDER TO SHOW  
CAUSE**

1 Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure, Petitioners  
2 hereby move the Court for emergency relief in the form of a temporary restraining  
3 order directing Respondents to release Petitioners from their custody or to provide  
4 Petitioners with individualized bond hearings before an immigration judge pursuant  
5 to 8 U.S.C. § 1226(a) within seven days of issuance of an Order.

6 Petitioners also seek a temporary restraining order enjoining the Respondents  
7 from relocating Petitioners outside of the Central District of California pending  
8 final resolution of this case.

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

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

14  
15 Dated: July 23, 2025

Respectfully submitted,

16 s/ Niels W. Frenzen  
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18 JEAN REISZ  
19 USC GOULD SCHOOL OF LAW,  
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28 Attorneys for Petitioners

**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 July 23, 2025 at approximately 11:15 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, 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: July 23, 2025

Respectfully submitted,

s/ Niels W. Frenzen  
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Attorneys for Petitioners

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 23, 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](mailto:David.M.Harris@usdoj.gov)

s/ Niels W. Frenzen  
Niels W. Frenzen  
Counsel for Petitioner