

1 Zachary Nightingale (California Bar # 184501)  
2 Christine Raymond (Massachusetts Bar #711907)\*  
3 Van Der Hout LLP  
4 360 Post St., Suite 800  
5 San Francisco, CA 94108  
6 Telephone: (415) 981-3000  
7 Facsimile: (415) 981-3003  
8 ndca@vblaw.com

9 \*Admitted Pro Hac Vice

10 Attorneys for Petitioner-Plaintiff  
11 Hao Day THAI

12 UNITED STATES DISTRICT COURT  
13  
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA

15 Hao Day THAI,

16 Petitioner-Plaintiff,

17 v.

18 Polly KAISER, Acting Field Office Director of  
19 San Francisco Office of Detention and Removal,  
20 U.S. Immigrations and Customs Enforcement;  
21 U.S. Department of Homeland Security;

22 Todd M. LYONS, Acting Director, Immigration  
23 and Customs Enforcement, U.S. Department of  
24 Homeland Security;

25 Kristi NOEM, in her Official Capacity,  
26 Secretary, U.S. Department of Homeland  
27 Security; and

28 Pam BONDI, in her Official Capacity, Attorney  
General of the United States;

Respondents-Defendants.

Case No. 4:25-cv-06293-JST

**NOTICE OF WITHDRAWAL  
OF:**

**MOTION FOR TEMPORARY  
RESTRAINING ORDER**

**POINTS AND AUTHORITIES  
IN SUPPORT OF EX PARTE  
MOTION FOR TEMPORARY  
RESTRAINING ORDER AND  
MOTION FOR PRELIMINARY  
INJUNCTION: HEARING  
REQUESTED**

Challenge to Unlawful Incarceration;  
Request for Declaratory and Injunctive  
Relief

1 Petitioner, Hao Day THAI, through counsel, hereby files this Notice of Withdrawal of his  
2 currently pending Motion for Temporary Restraining Order ("TRO"). Dkt. 2.

3 On July 28, 2025, the parties were able to stipulate that Mr. Thai would not be re-  
4 detained by Respondents at his July 29, 2025 check-in appointment with the U.S. Immigration  
5 and Customs Enforcement ("ICE"). Dkt. 10. Mr. Thai was indeed not re-detained at that  
6 appointment, and he completed the required forms for submitting a request for travel documents,  
7 as stipulated. *Id.*

8 Mr. Thai now seeks to withdraw his pending Motion for TRO. The parties will provide  
9 this Court with a proposed briefing schedule on the pending Petition for Writ of Habeas Corpus.  
10 Dkt. 1.

11  
12  
13 Dated: July 31, 2025

Respectfully submitted,

14 s/Christine Raymond  
15 Christine Raymond  
16 Zachary Nightingale  
17 Attorneys for Petitioner  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28