


1 Sabrina Damast (CA SBN #305710 and NY SBN #5005251)
2 Amy Lenhart (CA Bar #227717)
3 Rocio La Rosa (CA Bar #314831)
4 Law Office of Sabrina Damast, Inc.
5 510 West 6th Street, Suite 330
6 Los Angeles, CA 90014
7 Telephone: (323) 475-8716
8 Emails: sabrina@sabrinadamast.com
9 amy@sabrinadamast.com
10 rocio@sabrinadamast.com

11 Counsel for Petitioner
12 Artak Ovsepien

13 UNITED STATES DISTRICT COURT FOR THE
14 CENTRAL DISTRICT OF CALIFORNIA

15 Artak Ovsepien, Alien # 

16 Petitioner,
17 v.

Case No. 5:25-cv-01937

18 PAMELA BONDI, in her official capacity as
19 Attorney General,

20 KRISTI NOEM, in her official capacity as
21 Secretary of the Department of Homeland
Security,

U.S. DEPARTMENT OF HOMELAND
SECURITY,

F. SEMAIA, in his official capacity as Warden of
Adelanto Detention Facility,

ERNESTO SANTACRUZ, JR., in his official
capacity as Acting ICE Field Office Director,
Respondents.

PETITIONER'S MOTION
FOR A TEMPORARY
RESTRAINING ORDER

1 Petitioner, by and through his undersigned counsel, hereby files this motion
2 for a temporary restraining order pursuant to Fed. R. Civ. P. 65(d). Petitioner seeks
3 an order to preserve the status quo and to enjoin Respondents from transferring him
4 out of this judicial district during the pendency of his Petition for a Writ of Habeas
5 Corpus or ordering them to return him if he has already been transferred.

6 The TRO sought by Petitioner is an order barring Respondents from
7 transferring him out of this judicial district or removing him to a third country
8 without notice and an opportunity to be heard on any fear of persecution or torture
9 he has in that third country. Petitioner also requests the Court schedule oral
10 argument as soon as the Court's calendar allows and the parties are available,
11 should it be necessary to resolve this motion.

12 WHEREFORE, for the reasons set forth in the accompanying memorandum
13 of points and authorities, Petitioner respectfully requests this Court to grant the
14 Temporary Restraining Order and set the case for further briefing.
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