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Attorneys for Petitioner

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

R [REDACTED] K [REDACTED]

Petitioner,

vs.

JEREMY CASEY, in his official capacity
as Warden of the Imperial Regional
Detention Facility;

DAVID MARIN, in his official capacity as
Field Office Director of the Immigration
and Customs Enforcement, Enforcement
and Removal Operations Los Angeles Field
Office;

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

PAMELA BONDI, in her official capacity
as Attorney General of the United States,

Respondents.

Case No.: 3:25-cv-01926-DMS-DEB

**PETITIONER [REDACTED]
[REDACTED] S MOTION FOR (1)
TEMPORARY RESTRAINING
ORDER AND (2) ORDER TO SHOW
CAUSE RE PRELIMINARY
INJUNCTION**

**Memorandum in Support,
Declarations, and Exhibits Submitted
Herewith**

Judicial Officer: Hon. Dana M. Sabraw
Courtroom number: 13A
Hearing Date and Time: None Set.

PETITIONER'S MOTION FOR TEMPORARY RESTRAINING ORDER AND
ORDER TO SHOW CAUSE RE PRELIMINARY INJUNCTION

Case No. 3:25-cv-01926-DMS-DEB

1 **TO THE CLERK OF COURT, ALL PARTIES, AND THEIR ATTORNEYS**
2 **OF RECORD:**

3 PLEASE TAKE NOTICE Pursuant to Federal Rule of Civil Procedure 65 and
4 Local Rule 83.3(g) and having provided notice to Defendants of this motion,
5 Petitioner [REDACTED] ("Petitioner" or "Mr. [REDACTED]") moves this Court for a
6 temporary restraining order and for the issuance of an order to show cause why a
7 preliminary injunction should not issue as follows:

8 1) A temporary restraining order that Respondents JEREMY CASEY, in
9 his official capacity as Warden of the Imperial Regional Detention Facility; DAVID
10 MARIN, in his official capacity as Field Office Director of the Immigration and
11 Customs Enforcement, Enforcement and Removal Operations Los Angeles Field
12 Office; KRISTI NOEM, in her official capacity as Secretary of the Department of
13 Homeland Security; and PAMELA BONDI, in her official capacity as Attorney
14 General of the United States be immediately enjoined from continuing to detain Mr.
15 [REDACTED], and following his release, be enjoined from re-detaining Mr. [REDACTED]
16 without complying with all applicable regulatory, statutory, and constitutional
17 requirements predicate to such detention. Mr. [REDACTED] additionally seeks to enjoin
18 Respondents from removing him from the United States to Iran or any other country
19 without first complying with all applicable regulatory, statutory, and constitutional
20 requirements predicate to such removal.

21 2) Respondents shall show cause on _____, 2025 at _____ why a
22 preliminary injunction should not issue requiring them to act as described above.

23 3) The temporary restraining order shall remain effective until such time as
24 the Court has ruled on whether a preliminary injunction should issue. Such relief is
25 necessary to prevent Respondents from violating Mr. [REDACTED]'s rights and applicable
26 regulatory, statutory, and constitutional provisions.

1 Mr. [REDACTED] requests that this Court waive any bond requirement because
2 enjoining Respondents from violating applicable regulatory, statutory, and
3 constitutional provisions will not financially affect Respondents.

4 This Motion is made on the grounds that Mr. [REDACTED] is likely to succeed on
5 the merits of this case, will suffer irreparable harm without immediate injunctive
6 relief, the balance of equities tips sharply in his favor, and the relief sought is in the
7 public interest. The accompanying Memorandum of Law, declarations, and exhibits
8 set forth the specific reasons, authorities, and facts warranting immediate relief.

9 On July 29, 2025, counsel for Petitioner contacted counsel for Respondents,
10 Caroline Prime of the US Attorney's Office for the Southern District of California.
11 Counsel for Petitioner gave notice to Ms. Prime that Petitioner would be filing the
12 instant habeas petition as well as a motion for a Temporary Restraining Order and a
13 Preliminary Injunction. Ms. Prime referred counsel for Petitioner to Erin Dimbleby,
14 Assistant U.S. Attorney for the Southern District of California. Counsel for Petitioner
15 further notified Ms. Dimbleby that Petitioner would be filing the instant petition for a
16 writ of habeas corpus as well as a motion for a Temporary Restraining Order and
17 Preliminary Injunction. Ms. Dimbleby informed counsel for Petitioner that she had
18 reached out to ICE and would remit with any updates once they were notified of
19 Petitioner's case. Counsel for Petitioner further notified counsel for Respondents that
20 courtesy copies of the foregoing would be sent by electronic mail as well as served
21 under Fed. R Civ. P. 4.

22 **STEPTOE LLP**

23 Dated: July 30, 2025

24 /s/Michelle S. Kallen

25 Michelle S. Kallen

26 Michel Paradis

27 Jason Wright

28 Patrick Fields

Attorneys for Petitioner [REDACTED]