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11
12 UNITED STATES DISTRICT COURT
13 SOUTHERN DISTRICT OF CALIFORNIA

14 R  K 

15
16 *Petitioner,*

17 vs.

18 JEREMY CASEY, in his official capacity
19 as Warden of the Imperial Regional
20 Detention Facility; et al.

21
22 *Respondents.*

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

23 **PETITIONER **
24 **'S RENEWED MOTION**
FOR (1) TEMPORARY
RESTRAINING ORDER AND (2)
ORDER TO SHOW CAUSE RE
PRELIMINARY INJUNCTION

Memorandum in Support Submitted
Herewith

Judicial Officer: Hon. Dana M. Sabraw
Courtroom number: 13A
Hearing Date/Time: N/A

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28 **RENEWED MOTION FOR TRO AND ORDER TO SHOW CAUSE RE**
PRELIMINARY INJUNCTION

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

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

1) A temporary restraining order that Respondents 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; and PAMELA BONDI, in her official capacity as Attorney General of the United States be immediately enjoined from continuing to detain Mr. [REDACTED], and following his release, be enjoined from re-detaining Mr. [REDACTED] without complying with all applicable regulatory, statutory, and constitutional requirements predicate to such detention.

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

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

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

1 This Renewed Motion is made on the grounds that there has been a material
2 change in the known facts related to Mr. [REDACTED]'s detention. Mr. [REDACTED] is likely
3 to succeed on the merits of this case. Further, both he and his mother (who depends
4 upon him and is scheduled for brain surgery on October 7) will suffer irreparable
5 harm without immediate injunctive relief. The balance of equities tips sharply in his
6 favor and the relief sought is in the public interest. This motion is based upon the
7 accompanying Memorandum of Law, the petition for habeas corpus and any return
8 or reply thereto, the declarations and exhibits filed in this action, the filings in this
9 action, and any further briefing or argument on this motion.

10 On October 1, 2025 and again on October 3, 2025, counsel for Petitioner
11 contacted counsel for Respondents, Sam Bettwy of the US Attorney's Office for the
12 Southern District of California. Counsel for Petitioner gave notice to Mr. Bettwy that
13 Petitioner would be filing the instant renewed motion for a Temporary Restraining
14 Order and a Preliminary Injunction.

15 Respectfully submitted,

16 STEPTOE LLP

17 Dated: October 3, 2025

18 /s/Michelle S. Kallen

19 Michelle S. Kallen

20 Michel Paradis

21 Jason Wright

22 Conor Tucker

23 Patrick Fields

24 Attorneys for Petitioner [REDACTED]