

1 Stacy Tolchin (CA SBN #217431)
2 *Email: Stacy@Tolchinimmigration.com*
3 Law Offices of Stacy Tolchin
4 776 E. Green St., Suite 210
5 Pasadena, CA 91101
6 Telephone: (213) 622-7450
7 Facsimile: (213) 622-7233

8 Counsel for Petitioner

9
10 **UNITED STATES DISTRICT COURT FOR THE**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12

13 Long TON,

14 Petitioner,

15 v.

16 Kristi NOEM, Secretary, Department of
17 Homeland Security; Todd LYONS, in his
18 official capacity as Acting Director of U.S.
19 Immigration and Customs Enforcement; Pam
20 BONDI, Attorney General of the United
21 States; Ernesto SANTACRUZ Jr., Acting
22 Director, Los Angeles ICE Field Office; and
23 Fereti SEMAIA, Warden, Adelanto ICE
24 Processing Center.

25 Respondents.
26
27
28

No. 5:25-cv-02033-SB-AGR

PETITIONER'S RESPONSE TO
AUGUST 13, 2025 ORDER (DKT
11)

1 Petitioner hereby notifies the Court that he intends to pursue a Preliminary
2 Injunction, and informed Respondents of such on August 13, 2025.

3 Local Rule 65-1 provides that if a Temporary Restraining Order is denied,
4 the Court may set the hearing on the order to show cause without regard to the
5 twenty-eight (28) days notice of motion requirement of L.R. 6-1.

6 Petitioner asks that the Court set the hearing on the application for
7 preliminary injunction, and deny the TRO if necessary in order to meet the
8 requirements of Local Rule 65-1. He asks the Court to convert the Application for a
9 Temporary Restraining Order (Dkt #4) into an Application for Preliminary
10 Injunction.

11 If the Court is not amenable to such action, Petitioner withdraws the Order to
12 Show Cause and will file a Motion for Preliminary Injunction once the seven day
13 period for Rule 7-3 has elapsed.

14
15
16 Dated: August 13, 2025

Respectfully Submitted,

S/Stacy Tolchin

18 Stacy Tolchin (CA SBN #217431)
19 Law Offices of Stacy Tolchin
20 776 E. Green St., Ste. 210
Pasadena, CA 91101
21 Telephone: (213) 622-7450
22 Facsimile: (213) 622-7233
23 Email: Stacy@Tolchinimmigration.com
24 Counsel for Petitioner
25
26
27
28