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Counsel for Petitioner

Nadar Nadari

UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA

Nadar Nadari, Alien # 

Petitioner,

v.

PAMELA BONDI, in her official capacity as
Attorney General,

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

U.S. DEPARTMENT OF HOMELAND
SECURITY,

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

Case No. 2:25-cv-07893

PETITIONER'S MOTION
FOR A TEMPORARY
RESTRAINING ORDER

Petitioner, by and through his undersigned counsel, hereby files this motion
for a temporary restraining order pursuant to Fed. R. Civ. P. 65(d). Petitioner seeks

1 an order to preserve the status quo and to enjoin Respondents from transferring him
2 out of this judicial district during the pendency of his Petition for a Writ of Habeas
3 Corpus or ordering them to return him if he has already been transferred.

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

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

13 **RESPECTFULLY SUBMITTED this 25th day of August, 2025**

14 /s/ Sabrina Damast

Sabrina Damast, CA Bar # 305710, NY Bar # 5005251

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