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7 **UNITED STATES DISTRICT COURT**
8 **SOUTHERN DISTRICT OF CALIFORNIA**

9 Julian VASQUEZ GARCIA;
10 Nicolas JIATAZ PATZAN;
11 Alfredo VASQUEZ,

12 Petitioners,

13 v.

14 Kristi NOEM, Secretary, U.S.
15 Department of Homeland Security;
16 Pamela BONDI, U.S. Attorney General;
17 Todd LYONS, Acting Director,
18 Immigration and Customs Enforcement;
19 Gregory J. ARCHAMBEAULT,
20 Director, San Diego Field Office,
21 Immigration and Customs Enforcement,
22 Enforcement and Removal Operations;
23 Jeremy CASEY, Warden, Imperial
24 Regional Detention Facility;
25 IMMIGRATION AND CUSTOMS
26 ENFORCEMENT; DEPARTMENT OF
27 HOMELAND SECURITY,
28

Respondents.

Case No. 3:25-cv-02180-DMS-MMP

**PETITIONERS' EX PARTE
APPLICATION FOR
TEMPORARY RESTRAINING
ORDER AND ORDER TO SHOW
CAUSE**

1 Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure, Petitioners
2 hereby move the Court for emergency relief in the form of a temporary restraining
3 order directing Respondents to release Petitioners from their custody or to provide
4 Petitioners with individualized bond hearings before an immigration judge pursuant
5 to 8 U.S.C. § 1226(a) within seven days of issuance of an Order.

6 Petitioners also seek a temporary restraining order enjoining the Respondents
7 from relocating Petitioners outside of the Southern District of California pending
8 final resolution of this case.

9 Petitioners further move for the issuance of an order to show cause as to why
10 a preliminary injunction should not issue.

11 This application is supported by the Memorandum of Points and Authorities,
12 accompanying exhibits, as well as any additional submissions that may be
13 considered by the Court.

14 As described in the Declaration of Counsel below, counsel for Respondents
15 has been provided with advance notice of this filing.

16
17 Dated: August 25, 2025

Respectfully submitted,

18 s/ Niels W. Frenzen
19 NIELS W. FRENZEN
20 JEAN REISZ
21 USC GOULD SCHOOL OF LAW,
22 IMMIGRATION CLINIC
23 699 Exposition Blvd
24 Los Angeles, CA 90089-0071
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27 Attorneys for Petitioners
28

1 **CivLR 83.3.g.2 DECLARATION OF COUNSEL**

2 Pursuant to Rule 65(b)(1)(B) of the Federal Rules of Civil Procedure and
3
4 CivLR 83.3.g.2, I hereby certify that on August 22, 2025 at approximately 2:00
5 PM, I emailed Ms. Janet Cabral, Chief, Civil Division, U.S. Attorney's Office,
6 Southern District of California, and informed her that my office was preparing to
7
8 file this ex parte application for TRO on Monday, August 25, 2025. Ms. Cabral
9 confirmed receipt of my email and asked that I email copies of the pleadings to her
10 and AUSA Erin Dimbleby once filed.
11

12 I have provided a copy of the Application for a Temporary Restraining
13 Order, Memorandum of Points and Authorities, Supporting Exhibits, and Petition
14 for Writ of Habeas Corpus to Ms. Cabral and Ms. Dimbleby by email at
15
16 approximately 10:00 AM on August 25, 2025.
17

18 Dated: August 25, 2025
19

Respectfully submitted,

20 s/ Niels W. Frenzen
21 NIELS W. FRENZEN
22 JEAN REISZ
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Attorneys for Petitioners

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 25, 2025, I served a copy of this Application for TRO and OSC by email to the following individuals:

Janet Cabral, AUSA
Chief, Civil Division
U.S. Attorney's Office
Southern District of California
Janet.Cabral@usdoj.gov

Erin Dimbleby, AUSA
U.S. Attorney's Office
Southern District of California
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s/ Niels W. Frenzen
Niels W. Frenzen
Counsel for Petitioners