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Counsel for Petitioner
Francisco Cerritos Echevarria

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF ARIZONA**

FRANCISCO CERRITOS ECHEVARRIA,
Alien # 

Petitioner,

v.

PAM BONDI, in her official capacity as
Attorney General

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

FRED FIGUEROA, in his official capacity
as Warden of Eloy Detention Center,

JOHN E. CANTU, in his official capacity as
ICE Field Office Director of the Phoenix
Field Office,

Respondents

Case No.

PETITIONER'S
APPLICATION FOR
TEMPORARY
RESTRAINING ORDER
AND ORDER TO SHOW
CAUSE

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

Petitioner further moves for the issuance of an order to show cause as to why a preliminary injunction should not issue.

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

RESPECTFULLY SUBMITTED this 4th day of September, 2025

/s/ Mackenzie Mackins

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ATTORNEY FOR PETITIONER

CERTIFICATE OF COUNSEL

Pursuant to Rule 65(b)(1)(B) of the Federal Rules of Civil Procedure and L.R. 65-1, I hereby certify that on August 8, 2025, I emailed Katherine Branch, Chief of the Civil Division, U.S. Attorney's Office, District of Arizona. I provided a copy of the Application for a Temporary Restraining Order, Memorandum of Points and Authorities, and Petition for Writ of Habeas Corpus to Ms. Branch by emailing copies to Katherine.Branch@usdoj.gov.

Dated: September 4, 2025

Respectfully submitted,

/s/ Mackenzie Mackins

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ATTORNEY FOR PETITIONER

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 8, 2025, I served a copy of this Application for TRO and OSC by email to the following individual:

Katherine Branch
Chief of the Civil Division
U.S. Attorney's Office
Two Renaissance Square 40 N. Central Avenue, Suite 1800
Phoenix, AZ 85004
Email: Katherine.Branch@usdoj.gov

s/ Mackenzie W. Mackins
Mackenzie W. Mackins

Counsel for Petitioner