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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
TACOMA DIVISION

ANDRES CASTILLO AREDONDO, Petitioner, – against – TODD LYONS, ACTING DIRECTOR IMMIGRATION CUSTOMS AND ENFORCEMENT; KENNETH HAMILTON, ACTING ASSISTANT FIELD OFFICE DIRECTOR, SEATTLE OFFICE Respondents.	Case No. 2:25-cv-01838-TMC **APPLICATION FOR TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE RE: PRELIMINARY INJUNCTION**

NOTICE OF APPLICATION

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Petitioner Andres Castillo Aredondo ("Petitioner" or "Aredondo") hereby applies to this Court pursuant to Federal Rule of Civil Procedure 65, and 5 U.S.C. §705 seeking an Application for a Temporary Restraining Order and Order to Show Cause regarding Preliminary Injunction. The present application is necessary, as detailed below and in the Memorandum of Points and Authorities to prevent further irreparable injury before a hearing on a preliminary injunction may be held.

Petitioner has resided in the United States for approximately nineteen years and was arrested as part of a largescale immigration action in Los Angeles, CA. Petitioner was charged in removal proceedings with having entered the United States without inspection and appeared for a bond hearing on October 2, 2025 at the Tacoma Immigration Court. On October 2, 2025, the immigration judge found that the Court lacked jurisdiction to consider the merits of the bond redetermination hearing. The refusal to hear the merits of a bond redetermination proceeding violates the Immigration and Nationality Act and Petitioner's due process rights. Petitioner now seeks a temporary restraining order requiring Respondents to immediately release Petitioner from custody. Petitioner asks that the Court order Petitioner's release on his own recognizance, and that Respondents may not re-detain Petitioner without a bond hearing on the merits where the government must prove by clear and convincing evidence that Petitioner is a danger to the community and a flight risk such that physical custody is required. In the alternative, Petitioner asks that the Court order that the immigration judge hold a bond hearing on the merits.

Petitioner requests that the Court issue a temporary restraining order and order to show cause regarding the preliminary injunction in the form of the proposed order submitted concurrently herewith. This Application is based on the Petition for Writ of Habeas Corpus, Memorandum of Points and Authorities in support of the Application for a TRO and the declaration and exhibits in support thereof.

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DATED: October 3, 2025 By: s/ Benjamin Cornell

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MEMORANDUM OF POINTS AND AUTHORITIES

1. INTRODUCTION

Petitioner Andres Castillo Aredondo ("Petitioner" or "Aredondo") brings the present Application for a Temporary Restraining Order ("TRO") and asks the Court to grant his TRO and Order to Show Cause regarding Preliminary Injunction and order Respondents to release him from custody on his own recognizance or in the alternative to order a bond hearing on the merits before an immigration judge pursuant to 8 U.S.C. § 1226(a) within seven days of the issuance of the TRO.

Petitioner meets all the requirements that would merit the grant of the present application for a TRO. First, as discussed further below, Petitioner is likely to succeed on the merits. Petitioner should be classified as bond eligible under 8 U.S.C. § 1226(a) and not subject to mandatory detention under § 1225 (b)(2). Indeed, it defies logic that a person who has been in the United States for approximately nineteen years would not be entitled to due process protections of § 1226(a). It also defies logic that that Petitioner would be treated the same as an applicant for admission, as though he just showed up at the border seeking entry. Petitioner was arrested in the interior of the United States more than nineteen years after he entered the United States. The plain language of § 1226(a) applies to this exact scenario.

Next, the other TRO factors also weigh in favor of Petitioner. There is ample case law supporting that Petitioner's continued detention without a bond hearing on the merits would and is causing immediate and irreparable injury. Lastly, the balance of hardships and public interest factors weigh in favor of the TRO because the government's position is inconsistent with federal law.

Petitioner respectfully requests that the Court grant his Application for a Temporary Restraining Order enjoining Respondents from continuing to detain him unless Petitioner is provided with a bond hearing on the merits before an immigration judge pursuant to 8 U.S.C. § 1226(a) within seven days of the issuance of the TRO.

2. FACTUAL BACKGROUND

Petitioner has lived in Los Angeles, CA for more than approximately nineteen years. (Cornell Decl." at ¶ 2, Ex. A). He has three U.S. Citizen children. (Cornell Decl. at ¶ 3, Ex. A). Petitioner has no criminal history nor any other encounters with U.S. Immigration. (Cornell Decl. at ¶ 4, Ex. A). Petitioner is an active member of his church community. (Cornell Decl. at ¶ 5, Ex. A).

On August 9, 2025, Petitioner was arrested at the Home Depot Marina Del Rey, in Los Angeles, CA. (Cornell Decl. at ¶ 6, Ex. B).

On October 2, 2025, Petitioner had a bond hearing in Tacoma Immigration Court. (Cornell Decl. at ¶ 7). On October 2, 2025, IJ Fitting denied Petitioner's bond on the basis that she lacked jurisdiction. (Cornell Decl. at ¶ 7, Ex. C). The merits of the bond hearing were not addressed by the Court because the Court found that it lacked jurisdiction and classified Petitioner as an applicant for admission under INA 235 or 8 U.S.C. § 1225(b)(2). (Cornell Decl. at ¶ 8, Ex. C).

3. ARGUMENT

A. LEGAL STANDARD

Ex parte applications are for extraordinary relief. *See Mission Power Engineering Co. v. Continental Casualty Co.*, 883 F. Supp. 488 (C.D. Cal. 1995). Petitioner must show (i) that they "will be irreparably prejudiced if the underlying motion is heard according to the regular noticed motion procedures" and (ii) that they are "without fault in creating the crisis that requires ex parte relief, or that the crisis occurred as a result of excusable neglect." *Mission Power*, 883 F. Supp. at 293).

"A plaintiff seeking a preliminary injunction must establish that he is likely to succeed on the merits, that he is likely to suffer irreparable harm in the absence of preliminary relief, that the balance of equities tips in his favor, and that an injunction is in the public interest." *Winter v.*

Nat. Res. Def. Council, Inc., 555 U.S. 7, 20 (2008) (*citing Munaf v. Geren*, 553 U.S. 674, 689–90 (2008); *Amoco Prod. Co. v. Vill. of Gambell*, 480 U.S. 531, 542 (1987); *Weinberger v. Romero-Barcelo,* 456 U.S. 305, 311–12 (1982)). "Likelihood of success on the merits is a threshold inquiry and is the most important factor." Simon v. City & Cnty. of San Francisco, 135 F.4th 784, 797 (9th Cir. 2025) (*quoting Env't Prot. Info. Ctr. v. Carlson*, 968 F.3d 985, 989 (9th Cir. 2020)). "[I]f a plaintiff can only show that there are serious questions going to the merits—a lesser showing than likelihood of success on the merits—then a preliminary injunction may still issue if the balance of hardships tips sharply in the plaintiff's favor, and the other two Winter factors are satisfied." *Friends of the Wild Swan v. Weber*, 767 F.3d 936, 942 (9th Cir. 2014) (internal quotation marks and citations omitted).

Here, as discussed further below, Petitioner is likely to succeed on the merits, is currently suffering irreparable harm, and the balance of equities and public interest weigh in Petitioner's favor.

B. PETITIONER IS LIKELY TO SUCCEED ON THE MERITS OF HIS CLAIM

The likelihood of success factor weighs in Petitioner's favor because Petitioner is likely to succeed on his claims that 8 U.S.C. § 1226(a) governs his detention, not 8 U.S.C. § 1225(b)(2) and that his ongoing detention by Respondents under 8 U.S.C. § 1225(b)(2) and the denial of a bond hearing on the merits is unlawful.

Further, Petitioner possesses a protected liberty interest under the Fifth Amendment. The due process clause of the Fifth Amendment applies to all "persons" within the United States, including aliens, whether their presence is lawful, unlawful, temporary, or permanent. *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001). Thus, Petitioner's continued detainment violates his due process rights.

The same issues presented in the present Application for TRO have been addressed in Ninth Circuit Federal Courts of the Western District of Washington and in the Central District of California. *See Rodriguez v. Bostock*, No. 3:25-CV-05240-TMC, 2025 WL 1193850, at *16 (W.D. Wash. Apr. 24, 2025)(granting Petitioner's preliminary injunction, and finding that petitioner is likely to succeed on the merits, that his detention should be governed under Section 1226(a), ordering a bond hearing, and enjoining Respondents from denying bond on the basis that he is detained pursuant to 8 U.S.C. § 1225(b)(2)).; *See also Bautista v. Santacruz*, No. 5:25-cv-01873-SSS-BFM, 2025 U.S. Dist. LEXIS 171364, *24 (C.D. Ca. Jul. 28, 2025) (Ordering that "Respondents are enjoined from continuing to detain Petitioners unless they are provided an individualized bond hearing before an immigration judge pursuant to 8 U.S.C. § 1226(a) within 7 days of the date of this Order"); *Gomes v. Hyde*, No. 1:25-CV-11571-JEK, 2025 U.S. Dist. LEXIS 128085, at *24 (D. Mass. July 7, 2025) (remanding the case to the Immigration Court with instructions to consider Petitioner's eligibility for bond under Section 1226(a)).

The same result is warranted here.

I. 8 U.S.C. § 1226(a) Governs Petitioner's Detention.

8 U.S.C. 1226(a) recites as follows:

(a) Arrest, detention, and release

On a warrant issued by the Attorney General, an alien may be arrested and detained pending a decision on whether the alien is to be removed from the United States. Except as provided in subsection (c) and pending such decision, the Attorney General—

(1) may continue to detain the arrested alien; and

(2) may release the alien on—

(A) bond of at least $1,500 with security approved by, and containing conditions prescribed by, the Attorney General; or

(B) conditional parole; but

(3) may not provide the alien with work authorization (including an "employment authorized" endorsement or other appropriate work permit), unless the alien is lawfully admitted for permanent residence or otherwise would (without regard to removal proceedings) be provided such authorization.

8 U.S.C. 1226(a) clearly states that Petitioner may be released on "bond of at least $1,500." However, Respondents claim that Petitioner is not eligible for bond and should be classified under 8 U.S.C. §1225(b)(2) as an applicant for admission which states:

(2) Inspection of other aliens

(A) In general

Subject to subparagraphs (B) and (C), in the case of an alien who is an applicant for admission, if the examining immigration officer determines that an alien seeking admission is not clearly and beyond a doubt entitled to be admitted, the alien shall be detained for a proceeding under section 1229a of this title.

8 U.S.C. § 1225 (b)(2) applies to the inspection of aliens arriving in the United States and arrested without a warrant at the border or other ports of entry. The Supreme Court recognized, § 1225 is concerned "primarily [with those] seeking entry," *Jennings v. Rodriguez*, 583 U.S. 281, 297 (2018), i.e., cases "at the Nation's borders and ports of entry, where the Government must determine whether a[] [noncitizen] seeking to enter the country is admissible." *Id.* at 287. The entire statute is premised on the idea that an inspection occurs near the border and shortly after arrival, as the statute repeatedly refers to "examining immigration officer[s]," 8 U.S.C. §

1225(b)(2)(A), (b)(4), or officers conducting "inspection[s]" of people "arriving in the United States," id. § 1225(a)(3), (b)(1), (b)(2), (d); *see also King v. Burwell*, 576 U.S. 473, 492 (2015) (looking to an Act's "broader structure . . . to determine [the statute's] meaning").

8 U.S.C. § 1225(b)(2)(A) clearly does not apply to Petitioner and does not apply to those who are arrested in the interior of the United States years or decades later.

Section 1226(a) covers those who are present within and residing within the United States and who are not at the border seeking admission. Further, the distinction between persons already located inside the United States, like petitioner, and individuals attempting to enter the United States is important because "[i]t is well established that certain constitutional protections available to persons inside the United States are unavailable to aliens outside of our geographic borders." *Zadvydas*, 533 U.S. 678 at 693 (*citing United States v. Verdugo–Urquidez*, 494 U.S. 259, 269 (1990); *Johnson v. Eisentrager*, 339 U.S. 763, 784 (1950)). "But once an alien enters the country, the legal circumstance changes, for the Due Process Clause applies to all 'persons' within the United States, including aliens, whether their presence here is lawful, unlawful, temporary, or permanent." *Id.*

II. Legislative History Makes Clear That § 1226(a) Governs Petitioner's Detention.

The legislative history of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA), Pub. L. No. 104-–208, Div. C, §§ 302–03, 110 Stat. 3009-546, 3009–582 to 3009–583, 3009–585, also supports the conclusion that § 1226(a) applies to Petitioners, not §1225. In passing the Act, Congress was focused on the perceived problem of recent arrivals to the United States who did not have documents to remain. See H.R. Rep. No. 469, pt. 1, at 157–58, 228–29; H.R. Rep. No. 104-828, at 209. Notably, Congress did not say anything about

subjecting all people present in the United States after an unlawful entry to mandatory detention if arrested. This is important, because prior to IIRIRA, people like Petitioner were not subject to mandatory detention. See 8 U.S.C. § 1252(a)(1) (1994) (authorizing Attorney General to arrest noncitizens for deportation proceedings, which applied to all persons physically present within the United States). Had Congress intended to make such a monumental shift in immigration law (potentially subjecting millions of people to mandatory detention), it would have explained so or spoken more clearly. *See Whitman v. Am. Trucking Ass'ns*, 531 U.S. 457, 468–69 (2001). But, Congress explained precisely the opposite, noting that the new § 1226(a) merely "restates the current provisions in [INA] section 242(a)(1) regarding the authority of the Attorney General to arrest, detain, and release on bond a[] [noncitizen] who is not lawfully in the United States." H.R. Rep. No. 104-469, pt. 1, at 229 (emphasis added); see also H.R. Rep. No. 104-828, at 210.

III. DHS practice makes clear that § 1226(a) governs Petitioner's detention.

DHS has long considered people like the Petitioner as detained under §1226(a). For decades, and across administrations, DHS has acknowledged that § 1226(a) applies to individuals who are present without admission after entering the United States unlawfully, but who were later apprehended within the United States long after their entry. Such a longstanding and consistent interpretation "is powerful evidence that interpreting the Act in [this] way is natural and reasonable." *Abramski v. United States*, 573 U.S. 169, 203 (2014) (Scalia, J., dissenting); *see also Bankamerica Corp. v. United States*, 462 U.S. 122, 130 (1983) (relying in part on "over 60 years" of government interpretation and practice to reject government's new proposed interpretation of the law at issue).

Indeed, agency regulations have long recognized that people like Petitioner are subject to detention under § 1226(a). Nothing in 8 C.F.R. § 1003.19(h)—the regulatory basis for the

immigration court's jurisdiction—provides otherwise. In fact, EOIR confirmed that § 1226(a) applies to Petitioners when it promulgated the regulations governing immigration courts and implementing § 1226 decades ago. Specifically, EOIR explained that "[d]espite being applicants for admission, [noncitizens] who are present without having been admitted or paroled (formerly referred to as [noncitizens] who entered without inspection) will be eligible for bond and bond redetermination." 62 Fed. Reg. at 10323.3

In sum, § 1226 applies to Petitioner. Section 1225 and its mandatory detention provision applies only to individuals arriving in the United States as specified in the statute, while § 1226 applies to those arrested on warrant, like Petitioner and who have previously entered and are now present and residing in the United States.

c. PETIONER WILL SUFFER IRREPERABLE HARM IN THE ABSENCE OF A TEMPORARY RESTRAINING ORDER

In the absence of a TRO, Petitioner will continue to be unlawfully detained by Respondents pursuant to § 1225(b)(2) and denied a bond hearing on the merits. Petitioner has now been detained for almost one month.

It "is well established that the deprivation of constitutional rights unquestionably constitutes irreparable injury." *Melendres v. Arpaio*, 695 F.3d 990, 1002 (9th Cir. 2012) (citation modified); *Warsoldier v. Woodford*, 418 3d 989, 1001-02 (9th Cir. 2005). *See also Hernandez v. Sessions,* 872 F.3d 976, 994–95 (9th Cir. 2017) ("Thus, it follows inexorably from our conclusion that the government's current policies [which fail to consider financial ability to pay immigration bonds] are likely unconstitutional—and thus that members of the plaintiff class will likely be deprived of their physical liberty unconstitutionally in the absence of the injunction—that Plaintiffs have also carried their burden as to irreparable harm."); *Bautista*, No. 2025 U.S. Dist. LEXIS 171364, *24 ("[T]he Court finds that the potential for Petitioners' continued

detention without an initial bond hearing would cause immediate and irreparable injury, as this violates statutory rights afforded under § 1226(a)).

"When an alleged deprivation of a constitutional right is involved, most courts hold that no further showing of irreparable injury is necessary." *Warsoldier v. Woodford*, 418 F.3d 989, 1001–02 (9th Cir. 2005) (*quoting* Wright, Miller, & Kane, Federal Practice and Procedure, § 2948.1 (2d ed. 2004)). As the Supreme Court has recognized, incarceration "has a detrimental impact on the individual" because "it often means loss of a job" and "disrupts family life." *Barker v. Wingo*, 407 U.S. 514, 532–33 (1972).

"Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty" that the Due Process Clause protects. *Zadvydas*, 533 U.S. at 690. Detention constitutes "a loss of liberty that is . . . irreparable." *Moreno Galvez v. Cuccinelli*, 492 F. Supp. 3d 1169, 1181 (W.D. Wash. 2020) (Moreno II), aff'd in part, vacated in part on other grounds, remanded sub nom. *Moreno Galvez v. Jaddou*, 52 F.4th 821 (9th Cir. 2022).

Thus, due to Petitioner's continued detention, he faces irreparable harm absent a temporary restraining order.

d. THE BALANCE OF EQUITIES AND PUBLIC INTEREST WEIGHS IN PETITIONER'S FAVOR

When the government is the nonmoving party, "the last two Winter factors merge." *Baird v. Bonta*, 81 F.4th 1036, 1040 (9th Cir. 2023). Petitioner has established that the public interest factor weighs in his favor because classifying Petitioner under § 1225(b)(2) deprives him of due process and is in violation of federal laws. *Index Newspapers LLC v. U.S. Marshals Serv.*,

977 F.3d 817, 838 (9th Cir. 2020) ("It is always in the public interest to prevent the violation of a party's constitutional rights.") (*citing Padilla*, 953 F.3d at 1147–48).

Because the policy preventing Petitioners from obtaining bond "is inconsistent with federal law, . . . the balance of hardships and public interest factors weigh in favor of a preliminary injunction." *Moreno Galvez v. Cuccinelli*, 387 F. Supp. 3d 1208, 1218 (W.D. Wash. 2019) (Moreno I); *see also Moreno Galvez*, 52 F.4th at 832 (affirming in part permanent injunction issued in Moreno II and quoting approvingly district judge's declaration that "it is clear that neither equity nor the public's interest are furthered by allowing violations of federal law to continue"). This is because "it would not be equitable or in the public's interest to allow the [government] . . . to violate the requirements of federal law, especially when there are no adequate remedies available." *Valle del Sol Inc. v. Whiting*, 732 F.3d 1006, 1029 (9th Cir. 2013) (second alteration in original) (citation omitted).

Thus, the balance of equities and public interest weigh in Petitioner's favor.

e. WAIVER OF EXHAUSTION IS APPROPRIATE HERE

Although prudential exhaustion may apply to habeas claims brought under 28 U.S.C. § 2241, a court may waive the prudential exhaustion requirement if "administrative remedies are inadequate or not efficacious, pursuit of administrative remedies would be a futile gesture, irreparable injury will result, or the administrative proceedings would be void." *Hernandez*, 872 F.3d at 988 (*quoting Laing v. Ashcroft*, 370 F.3d 994, 1000 (9th Cir. 2004)). "The party moving the court to waive prudential exhaustion requirements bears the burden of demonstrating that at least one of these Laing factors applies." *Aden v. Nielsen*, No. C18-1441RSL, 2019 U.S. Dist. LEXIS 194142, 2019 WL 5802013, at *2 (W.D. Wash. Nov. 7, 2019) (*citing Ortega-Rangel*, 313 F. Supp. 3d at 1003).

Waiver of the prudential exhaustion requirement is appropriate here because 1) an appeal to the BIA would be futile and 2) because of the irreparable harm that would result in waiting for an appeal before the BIA. Futility is an exception to the prudential exhaustion requirement. Here, Petitioner has already been denied a bond hearing on the merits by an IJ based on the view that § 1225 applies and not § 1226. Further, a recent BIA decision, *Matter of YAJURE HURTADO*, 29 I&N Dec. 216 (BIA 2025) stated that based on the plain language of section 235(b)(2)(A) of the Immigration and Nationality Act, 8 U.S.C. § 1225(b)(2)(A) (2018), Immigration Judges lack authority to hear bond requests or to grant bond to aliens who are present in the United States without admission.

Under these facts, an appeal to the BIA would be futile. In *Bautista*, 2025 U.S. Dist. LEXIS 171364, at *24 the Court stated it "was unconvinced that the administrative process would self-correct in light of the DHS Guidance Notice." The Court also took note of "DHS's unequivocal commitment to the contested legal authority in [the] matter", meaning that DHS was unlikely to correct itself.

Here, it is appropriate for this Court to interpret the appropriate statute that applies to Petitioner. The task of resolving this question of statutory interpretation belongs to the independent judgment of the courts. *Loper Bright Enters. v. Raimondo*, 603 U.S. 369, 385, 144 S. Ct. 2244, 219 L. Ed. 2d 832 (2024) ("When the meaning of a statute [is] at issue, the judicial role [is] to interpret the act of Congress, in order to ascertain the rights of the parties.")

Next, irreparable harm is also present here and is an exception to the prudential exhaustion requirement. The Ninth Circuit has previously held that irreparable harm is demonstrated when "at least some individuals who would be detained if not provided a bond hearing will be granted conditional release under [the proposed] injunction." *Rodriguez v.*

Robbins, 715 F.3d 1127, 1145 (9th Cir. 2013). Here, Petitioner is very likely to be granted conditional release if given a bond hearing because he does not pose a threat to the United States and has approximately nineteen years of contacts with the Los Angeles area that make him a low flight risk. As noted above, Petitioner has lived in Los Angeles, CA for approximately nineteen years. (Cornell Decl. at ¶ 2, Ex. A). He has three U.S. Citizen children. (Cornell Decl. at ¶ 3, Ex. A). Petitioner has no criminal history nor any other encounters with U.S. Immigration. (Cornell Decl. at ¶ 4, Ex. A). Petitioner attends church every Sunday. (Cornell Decl. at ¶ 5, Ex. A). Like the plaintiffs in *Rodriguez v. Robbins*, it is very likely that the only thing preventing Petitioner from conditional release pending the outcome of the removal proceedings is the statutory violation. *See also Cortez v. Sessions*, 318 F. Supp. 3d 1134, 1139 (N.D. Cal. 2018) (waiving exhaustion where detainee "suffers potentially irreparable harm every day that he remains in custody without a hearing, which could ultimately result in his release from detention").

District Courts in this circuit have routinely waived prudential exhaustion requirements for noncitizens like Petitioner facing prolonged detention while awaiting administrative appeals. *See, e.g., Montoya Echeverria v. Barr,* No. 20-CV-02917-JSC, 2020 U.S. Dist. LEXIS 92510, 2020 WL 2759731, at *6 (N.D. Cal. May 27, 2020), *Marroquin Ambriz*, 420 F. Supp. 3d at 961-62 (N.D. Cal. 2019), *Ortega-Rangel*, 313 F. Supp. 3d at 1003-04, Cortez, 318 F. Supp. 3d at 1138-39; *Villalta v. Sessions*, No. 17-CV-05390-LHK, 2017 U.S. Dist. LEXIS 162981, 2017 WL 4355182, at *3-4 (N.D. Cal. Oct. 2, 2017); *Lopez Reyes*, 2018 U.S. Dist. LEXIS 222013, 2018 WL 7474861, at *6-7, *Rios-Troncoso v. Sessions*, No. CV1701492PHXDGCMHB, 2017 U.S. Dist. LEXIS 141885, 2017 WL 3838686, at *3 (D. Ariz. Sept. 1, 2017), *Birru v. Barr*, No. 20-CV-01285-LHK, 2020 U.S. Dist. LEXIS 68132, 2020 WL 1905581, at *3-4 (N.D. Cal. Apr. 17, 2020).

In sum, waiver of the prudential exhaustion requirement is appropriate and Petitioner respectfully requests that the Court grant the requested relief.

4. CONCLUSION

For the foregoing reasons, Petitioner respectfully asks the Court to grant the Application for a Temporary Restraining Order and Order to Show Cause.

s/ Benjamin Cornell

Benjamin Cornell