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ATTORNEY FOR PETITIONER

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JASON CHRISTOPHER JIMENEZ MOLINA

PETITIONER,

vs.

SERGIO ALBARRAN, ACTING FIELD OFFICE
DIRECTOR OF THE SAN FRANCISCO IMMIGRATION
AND CUSTOMS ENFORCEMENT OFFICE; TODD
LYONS, ACTING DIRECTOR OF UNITED STATES
IMMIGRATION AND CUSTOMS ENFORCEMENT;
KRISTI NOEM, SECRETARY OF THE UNITED
STATES DEPARTMENT OF HOMELAND SECURITY,
PAMELA BONDI, ATTORNEY GENERAL OF THE
UNITED STATES, ACTING IN THEIR OFFICIAL
CAPACITIES,

RESPONDENTS.

CASE No.: 3:25-cv-08427-TLT

HONORABLE TRINA L. THOMPSON
UNITED STATES MAGISTRATE JUDGE

**PETITIONER'S CLARIFICATION RE
EX PARTE APPLICATION FOR
TEMPORARY RESTRAINING
ORDER AND ORDER TO SHOW
CAUSE**

RESPONSE TO JUDGE'S ORDERS OF OCTOBER 22, 2025

In compliance with the Court's order, Petitioner, Jason C. Jimenez Molina submits clarification that their filing dated October 20, 2025 was intended as an application for temporary restraining order and order to show cause regarding a preliminary injunction.

Temporary restraining order and preliminary injunction standards are "substantially identical". See *Stuhlbarg Int'l Sales Co. v. John D. Brush & Co.*, 240 F.3d 832, 839 n.7 (9th Cir. 2001).

Petitioner requests that the Court issue a temporary restraining order (as granted by the Court) and order to show cause regarding the preliminary injunction in the form of the proposed order submitted to the Court on October 20, 2025.

For the reasons stated in the application filed October 20, 2025, Petitioner respectfully asks the Court to grant the Application for a Temporary Restraining Order and Order to Show Cause.

Dated: October 22, 2025

Respectfully submitted,

/s/ Nicole Alicia Gorney

Nicole Alicia Gorney
Attorney for Petitioner