

JOSE JORDAN AND ASSOCIATES, APLC

Jose R. Jordan, Esq. CA SBN 316268

Anastasia B. Jordan, Esq. CA SBN 314680

Alberto Consejo, Esq. CA SBN 316337

Jaqueline Vazquez, Esq. SBN 358024

210 N. Citrus Ave., Suite A

Covina, CA 91723

1000 J. POLYMER SCIENCE: PART A

Telephone: (626) 394-3321
Fax: (626) 380-2615

⁸ Facsimile: (626) 380-2613

E-Mail: info@josejordan.com

600 *Environ Biol Fish* (2004) 69–76

Attorneys for Petitioner

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Homero GARCIA,

) Civil Case No.:
) 2:25-cv-09474-KK-AS

Petitioner,

) PETITIONER'S *EX PARTE*
y) APPLICATION FOR
y) COMPLAINT FOR
y) TEMPORARY
y) RESTRAINING
y) ORDER AND ORDER TO
y) SHOW CAUSE

Kristi NOEM, Secretary, Department of Homeland Security; Pam BONDI, Attorney General; EXECUTIVE OFFICE FOR IMMIGRATION REVIEW; Todd LYONS, Executive Associate Director of ICE Enforcement and Removal Operations (ERO); and David A. MARIN, Adelanto Immigration and Customs Field Office Director.

Respondents.

11

1 Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure,
2 Petitioner hereby moves the Court for emergency relief in the form of a
3 temporary restraining order directing Respondents to release Petitioner from
4 their custody or to provide Petitioner with an individualized bond hearing
5 before an immigration judge pursuant to 8 U.S.C. § 1226(a) within seven (7)
6 days of issuance of an Order.
7

8 Petitioner also seeks a temporary restraining order enjoining
9 Respondents from relocating Petitioner outside of the Central District of
10 California pending final resolution of this case.
11

12 Petitioner further moves for the issuance of an order to show cause as
13 to why a preliminary injunction should not issue.
14

15 This application is supported by the Memorandum of Points and
16 Authorities, accompanying exhibits, as well as any additional submissions
17 that may be considered by the Court.
18

19 Respondents have indicated that they will either oppose this TRO
20 application or refrain from stipulating thereto until after it has been filed with
21 the court.
22

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24

25 //
26

1 Dated: October 7, 2025
2

3 Respectfully submitted,
4

5 /s/Jose R. Jordan, Esq.
6 JOSE JORDAN AND ASSOCIATES, APLC
7 210 N. Citrus Ave., Suite A
Covina, CA 91723

8 Telephone: (626) 594-5321
9 Facsimile: (626) 380-2615
E-Mail: info@josejordan.com

CERTIFICATE OF COUNSEL

3 Pursuant to Rule 65(b)(1)(B) of the Federal Rules of Civil Procedure,
4 L.R. 7-19.1, and L.R. 65-1, I hereby certify that on October 7, 2025, I spoke
5 to Daniel Beck, Chief, Complex and Defensive Litigation Section, U.S.
6 Attorney's Office, Central District of California to inquire into whether
7 Respondents would oppose a TRO. More specifically, I provided Mr. Beck
8 with a copy of the Application for a Temporary Restraining Order,
9 Memorandum of Points and Authorities, and Petition for Writ of Habeas
10 Corpus to Mr. Beck by emailing copies thereof to Daniel.Beck@usdoj.gov
11 shortly after filing the pleadings via CM/ECF.
12
13
14

16 | Dated: October 7, 2025

Respectfully submitted,

19 /s/Jose R. Jordan, Esq.
20 JOSE JORDAN AND ASSOCIATES, APLC
21 210 N. Citrus Ave., Suite A
22 Covina, CA 91723

22 Telephone: (626) 594-5321
23 Facsimile: (626) 380-2615
24 E-Mail: info@ioseijordan.com