

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

Telephone: (626) 594-5321

Facsimile: (626) 380-2615

E-Mail: info@josejordan.com

Attorneys for Petitioner

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Norma Lucina SALDANA GUZMAN,

Petitioner,

v.

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.

Civil Case No. _____

**PETITIONER'S *EX PARTE*
APPLICATION FOR
COMPLAINT 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

1
2 temporary restraining order directing Respondents to release Petitioner from
3 their custody or to provide Petitioner with an individualized bond hearing
4 before an immigration judge pursuant to 8 U.S.C. § 1226(a) within seven (7)
5 days of issuance of an Order.
6

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

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

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

18 Respondents oppose this TRO Application.
19

20 Dated: October 9, 2025

21 Respectfully submitted,

22 /s/Jose R. Jordan, Esq.

23 JOSE JORDAN AND ASSOCIATES, APLC

24 210 N. Citrus Ave., Suite A

25 Covina, CA 91723

26 Telephone: (626) 594-5321

27 Facsimile: (626) 380-2615

28 E-Mail: info@josejordan.com

CERTIFICATE OF COUNSEL

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

Dated: October 9, 2025

Respectfully submitted,

/s/Jose R. Jordan, Esq.

JOSE JORDAN AND ASSOCIATES, APLC
210 N. Citrus Ave., Suite A
Covina, CA 91723

Telephone: (626) 594-5321

Facsimile: (626) 380-2615

E-Mail: info@josejordan.com