

1 **JOSE JORDAN AND ASSOCIATES, APLC**

2 Jose R. Jordan, Esq. CA SBN 316268

3 Anastasia B. Jordan, Esq. CA SBN 314680

4 Alberto Consejo, Esq. CA SBN 316337

5 Jacqueline Vazquez, Esq. SBN 358024

6 210 N. Citrus Ave., Suite A

7 Covina, CA 91723

8 Telephone: (626) 594-5321

9 Facsimile: (626) 380-2615

10 E-Mail: info@josejordan.com

11 *Attorneys for Petitioner*

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

14 **Norma Lucina SALDANA GUZMAN,) Civil Case No. _____**

15 Petitioner,) **PETITIONER'S EX PARTE**
16 v.) **APPLICATION FOR**
17 Kristi NOEM, Secretary, Department of) **COMPLAINT FOR**
18 Homeland Security; Pam BONDI, Attorney) **TEMPORARY**
19 General; EXECUTIVE OFFICE FOR) **RESTRAINING**
20 IMMIGRATION REVIEW; Todd LYONS,) **ORDER AND ORDER TO**
21 Executive Associate Director of ICE) **SHOW CAUSE**
22 Enforcement and Removal)
23 Operations (ERO); and David A. MARIN,)
24 Adelanto Immigration and Customs)
25 Field Office Director,)
26 Respondents.)
27 _____

28 Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure,

29 Petitioner hereby moves the Court for emergency relief in the form of a

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

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

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

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

13 Respondents oppose this TRO Application.

14 Dated: October 9, 2025

15 Respectfully submitted,

16 /s/Jose R. Jordan, Esq.
17 JOSE JORDAN AND ASSOCIATES, APLC
18 210 N. Citrus Ave., Suite A
19 Covina, CA 91723

20 Telephone: (626) 594-5321
21 Facsimile: (626) 380-2615
22 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.

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Facsimile: (626) 380-2615
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