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13 **UNITED STATES DISTRICT COURT**  
 14 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

15 CUADRA ROMERO, Wilgen Jose



16 Petitioner,  
 17 v.

18 PAMELA BONDI, in her official capacity as  
 19 Attorney General,

20 KRISTI NOEM, in her official capacity as  
 21 Secretary of the Department of Homeland  
 22 Security,

23 U.S. DEPARTMENT OF HOMELAND  
 24 SECURITY,

25 CHARLES WALL, in his official capacity as  
 26 Warden of Imperial Regional Detention Facility,

27 TODD LYONS, in his official capacity as Acting  
 28 ICE Field Office Director,  
 Respondents.

Case No. '25CV2783 BJC VET

**PETITIONER'S NOTICE OF**  
**EMERGENCY**  
**APPLICATION FOR**  
**TEMPORARY**  
**RESTRAINING ORDER**  
**AND ORDER TO SHOW**  
**CAUSE REGARDING**  
**PRELIMINARY**  
**INJUNCTION**

**NOTICE OF EMERGENCY APPLICATION**

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**Moving Party:** Petitioner

**Place:** Hon.  
United States District Judge

**Relief Sought:** Pursuant to Fed. R. Civ. P. 65 and S.D. Cal. Civ. L.R. 7.1(e)(5) & 7.1(h), Petitioner respectfully moves for a Temporary Restraining Order (and an Order to Show Cause regarding a Preliminary Injunction) pending adjudication of his 28 U.S.C. § 2241 Petition for Writ of Habeas Corpus and related request for injunctive relief.

**Papers Submitted in Support:** Memorandum of Law

**Intent to Reply:** Pursuant to S.D. Cal. Civ. L.R. 7.1(e), Petitioner respectfully requests leave to file a reply to any opposition and proposes filing within two (2) court days after Respondents' opposition is filed (or on such schedule as the Court sets).

Dated: October 18, 2025

Respectfully submitted,

*Sabrina Damast*  
By: \_\_\_\_\_

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