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8 GONZALO GARCIA RUELAS

9 **UNITED STATES DISTRICT COURT**
10 **SOUTHERN DISTRICT OF CALIFORNIA**

11
12 GONZALO GARCIA RUELAS,
13
14 Petitioner,

15 vs.

16 CHRISTOPHER J. LAROSE, Senior
Warden, Otay Mesa Detention Center;
17 United States Immigration and Customs
Enforcement; KRISTI NOEM, Secretary,
18 United States Department of Homeland
Security; PAMELA BONDI, United
19 States Attorney General; TODD LYONS,
Acting Director, Immigration and
20 Customs Enforcement; GREGORY J.
ARCHAMBEAULT, Director, San Diego
21 Field Office, Immigration and Customs
Enforcement and Removal Operations;
U.S. Department of Homeland Security,
22 Respondents.

Case No. '25CV2798 BTM BJW

**NOTICE OF APPLICATION FOR
TEMPORARY RESTRAINING
ORDER**

[Memorandum of Points and Authorities
and Declaration of Laura Urias Filed
Concurrently Herewith]

Date:
Time:
Dept.:
Judge:

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NOTICE OF APPLICATION FOR TRO
Case No.

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on _____, 2025, at 8:30 a.m., or as soon
3 thereafter as the matter may be heard, Petitioner GONZALO GARCIA RUELAS (“Mr.
4 Garcia Ruelas”) will seek a Temporary Restraining Order (“TRO”) that requires
5 Respondents to release him from custody within seven (7) days of the issuance thereof.

6 Mr. Garcia Ruelas will also seek an Order prohibiting Respondents from relocating
7 him outside of the Southern District of California pending final resolution of this litigation.

8 Mr. Garcia Ruelas will seek the requested TRO pursuant to 8 U.S.C. § 1226(a) and
9 28 U.S.C. § 2241 on the basis that he is likely to suffer irreparable harm in the absence of
10 preliminary relief and has otherwise satisfied all other requirements to show that a writ of
11 habeas corpus should issue.

12 The hearing is not for the purpose of determining whether Plaintiff’s claim is actually
13 valid. The determination of the actual validity of the claim will be made in subsequent
14 proceedings in this action and will not be affected by the decision at the hearing on the
15 application for the Temporary Restraining Order.

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17 DATED: October 20, 2025

FOLEY & LARDNER LLP
JOHN J. ATALLAH
TAM C. WHEAT
KELSEY KREINDLER

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21 /s/ John J. Atallah
22 John J. Atallah
23 Attorneys for Petitioner
24 GONZALO GARCIA RUELAS
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NOTICE OF APPLICATION FOR TRO
Case No.