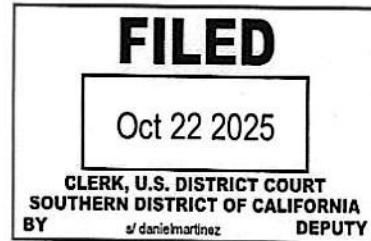


1 Victor E. Bianchini, Esq.
2 Attorney at Law
2600 6th Ave, Ste 205
3 San Diego, CA 92103
3 Bar No.: 35788
4 judgebianchini@icloud.com
4 (619) 248-0001



UNITED STATES DISTRICT COURT
FOR SOUTHERN DISTRICT OF CALIFORNIA

VLADIMIR ERNESTO PRIETO-CORDOVA

Petitioner,

v.

CHRISTOPHER J. LAROSE, *in his official capacity as Warden of the Otay Mesa Detention Center*; PATRICK DIVVER, *in his official capacity as Field Office Director of the Immigration and Customs Enforcement, and Removal Operations*; KRISTI NOEM, *in her official capacity as Secretary of the Department of Homeland Security*; PAMELA BONDI, *in her official capacity as Attorney General of the United States*,

Respondents.

**APPLICATION FOR TEMPORARY
RESTRANING ORDER (TRO)**

ORAL ARGUMENT REQUESTED

**IN CONECTION WITH: PETITION
FOR WRIT OF
HABEAS CORPUS**

Case No. '25CV2824 CAB DDL

INTRODUCTION

1. PERSONAL INFORMATION:

a. This application for a Temporary Restraining Order is in connection with the petition filed in behalf of Vladimir Ernesto Prieto-Cordova (hereinafter "Vladimir.")

b. Vladimir's Identification number is:

Vladimir is currently being held on orders by Federal authorities on immigration charges

2. Vladimir is confined at the federal immigration institute named Otay Mesa Detention Center, located at 7488 Calzada De La Fuente, San Diego, CA 92154.

BASES FOR THE TEMPORARY RESTRAINING ORDER

3. Vladimir suffered threats to his life and of torture by operatives of the Maduro regime in Venezuela. He fled Venezuela with his wife, and came to the United States, presented himself at the border, and was paroled into the United States by ICE agents and on the trust of these agents was permitted to enter the U.S., on or about January 23, 2022. He has lived peacefully since that time, until September 22, 2025, when he was ordered to report to ICE on the indication that he would be given an ankle bracelet upon his arrival. Instead, when he arrived, the ICE took him into custody

4. Your affiant, attorney Victor Bianchini, fears that the current policy of ICE is to either deport him back to his home country, Venezuela, which even ICE cannot do, and to find an alternative country. Because of ICE's practices, as reported in the news outlets, it is feared that they will deport him to a foreign country before he has a right to challenge his removal and perfect his asylum application. Thus, this request recognizes that this request is without notice, but is necessary because of current ICE practices and pressure from the Executive Branch, to deport large numbers of immigrants numbering in the millions.

1 5. This is not an individual with a worldwide reputation in his sport, who not a threat to the
2 United States, and to the contrary, he is serving the citizens of this nation in a very productive
3 manner.

4 6. Thus, your affiant request that this Court stay any removal proceedings and grant a
5 recognizance bond, so that Petitioner may resume his coaching position at University of San Diego
6 (UCSD), during this fencing season. His deportation would cause irreparable harm both to him
and the program which he supports.

7 7. These circumstances justify this restraining order without notice because of the pressure
8 that ICE is under to deport millions of immigrants before consequential political events occur.

9 8. Petitioner is not a flight risk, has an enormous responsibility to coach a team and an
10 individual with Olympic potential, and has a meritorious application for asylum.

11 9. Should this Temporary Restraining Order NOT issue, petitioner is likely to suffer
irreparable harm.

12 10. Petitioner recognizes that the Court's Order will reflect, the order is temporary as
13 litigation in the case is ongoing. At present, however, we ask that the Court's Order be in effect
14 with compliance mandatory. According to the conflicting positions among circuit courts, under
15 certain circumstances, temporary restraining orders (TROs) that extend beyond twenty days should
16 remain TROs and not be transformed into invalid preliminary injunctions.¹

17 11. Counsel for Petitioner will traveling on November 4, 2025 be out of the country until
November 22, 2025, and respectfully request the restraining order be heard no later than
18 November 3, 2025, or held over until November 23, 2025.

19

¹ Furey, Joseph Michael (1983) "Comments: The Duration of Temporary Restraining Orders in Federal Court," University of
20 Baltimore Law Review: Vol. 12: Iss. 2, Article 5. Available at: <https://scholarworks.law.ubalt.edu/ublr/vol12/iss2/5>

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully request that this Court:

- a. Assume jurisdiction over this matter;
- b. *Stay any removal proceedings while petitioner's Habeas application is pending*
- c. *Order Petitioner's immediate release on a recognizance bond pending resolution of his Habeas petition.*
- c. Grant any other further relief this Court deems just and proper.

Dated: October 21, 2025.

Respectfully submitted,

Victor E. Bianchini
Attorney at Law
Mediator, Arbitrator, Discovery Referee
2500 6th Avenue #205
San Diego, CA 92103
(619) 248-0001
judgebianchini@icloud.com
Pro Bono Counsel for Petitioner

Andres P. Lemons
Staff Attorney
University of California Immigrant Legal Services Center
9500 Gilman Drive, Mail Code 0048
Student Services Center 555
La Jolla, CA 92093-0048
Cell: (530) 219-8856
Email: andres.ucimm@law.ucdavis.edu
Pro Bono Counsel for Petitioner

1 Maria Chavez
2 Attorney at Law (Maryland)
3 Immigration Legal Director
4 Partnership for the Advancement of New
5 Americans
6 — PANA Tel: (619) 363-6939
7 <https://www.panasd.org>
8 Pro Bono Assistance for Petitioner

9
10 Admitted in Maryland Only
11
12
13
14
15
16
17
18
19
20