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11 **UNITED STATES DISTRICT COURT**
12 **SOUTHERN DISTRICT OF CALIFORNIA**

13 Henri Ba,

14 Petitioner,

15 v.

16 Todd Lyons, Acting Director
17 Immigration and Customs
18 Enforcement;

19 Patrick Divver, San Diego
20 Field Office Director,
21 Immigration and Customs
22 Enforcement Removal
23 Operations;

24 and

25 Christopher J. LaRose,
26 Warden, Otay Mesa
27 Detention Center,

28 Respondents.

CASE NO.: '25CV2871 CAB BJW

PETITIONER'S EX PARTE
APPLICATION FOR TEMPORARY
RESTRAINING ORDER AND ORDER
TO SHOW CAUSE

1 Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure, Petitioner
2 Henri Ba hereby moves the Court for emergency relief in the form of a temporary
3 restraining order directing Respondents to immediately release Petitioner from their
4 custody and enjoining the Respondents from relocating Petitioner outside of the
5 Southern District of California pending further Order of the Court.
6
7

8 Petitioner further moves for the issuance of an order to show cause as to why
9 a preliminary injunction should not issue.
10

11 This application is supported by the Memorandum of Points and Authorities,
12 accompanying exhibits, and any additional submissions that may be considered by
13 the Court.
14

15
16 Dated: October 24, 2025

Respectfully submitted,

17 s/ Jean Reisz
18 JEAN REISZ
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25 Attorney for Petitioner
26
27
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CivLR 83.3(g)(2)

Pursuant to Rule 65(b)(1)(B) of the Federal Rules of Civil Procedure and CivLR 83.3(g)(2), I hereby certify that on October 22, 2025, at approximately 1:05 PM PT, I emailed Ms. Janet Cabral, Chief, Civil Division, U.S. Attorney's Office, Southern District of California, and AUSA Erin Dimbleby and informed them that my office was preparing to file this ex parte application for TRO on Thursday, October 23, 2025. I received a response from Ms. Cabral that my email was received. On October 23, 2025 at 3:12PM I emailed Ms. Cabral and Ms. Dimbleby to update them that the ex parte application for TRO would be filed Friday October 24, 2025. I will provide a copy of the Application for a Temporary Restraining Order, Memorandum of Points and Authorities, Supporting Exhibits, and Petition for Writ of Habeas Corpus to Ms. Cabral, Ms. Dimbleby, and Mary Wiggins, Civil Docketing Clerk, U.S. Attorney's Office for the Southern District of California by email immediately after the pleadings are filed via ECF on October 24, 2025.

Dated: October 24, 2025

Respectfully submitted,

s/ Jean Reisz
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Attorney for Petitioner

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 24, 2025, I served a copy of this Application for TRO by email to the following individuals:

Mary Wiggins
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s/ Jean Reisz
JEAN REISZ
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