

1 Caroline Matthews (California #285754)
2 *Pro bono* counsel for the Petitioner
3 120 Stevens Avenue
4 Solana Beach, CA 92075
5 (858) 509-2597
6 caroline@pathwayssd.org

7 **UNITED STATES DISTRICT COURT**
8 **SOUTHERN DISTRICT OF CALIFORNIA**

9 BEATRIZ URIBE TREJO,
10
11 Plaintiff,

12 vs.

13 CHRISTOPHER LAROSE, warden of
14 Otay Mesa Detention Center
15 SIDNEY AKI, San Diego Field Office
16 Director, Immigration and Customs
17 Enforcement and Removal Operations
18 (“ICE/ERO”);
19 TODD LYONS, Acting Director of
Immigration Customs Enforcement
 (“ICE”);
KRISTI NOEM, Secretary of the
Department of Homeland Security
 (“DHS”);
PAMELA BONDI, Attorney General of
the United States,
U.S. DEPARTMENT OF HOMELAND
SECURITY;
U.S. IMMIGRATION AND
CUSTOMS ENFORCEMENT;

Respondents.

Case No.: 3:25-CV-03253-JES-DDL

Agency Number: 

APPLICATION FOR TEMPORARY
RESTRAINING ORDER AND
ORDER TO SHOW CAUSE

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

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

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

12
13 Dated: November 21, 2025

Respectfully Submitted,

14
15 /s/Caroline G. Matthews
16 Caroline G. Matthews, Esq.
17 Pro Bono Counsel for the Respondent
18
19

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 November 21, 2025, at approximately 2:46 p.m. 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 Monday, November 24, 2025. I received a response from Ms. Cabral that my email was received. 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 November 24, 2025.

Dated: November 24, 2025

/s/Caroline G. Matthews
Caroline G. Matthews, Esq.
Pro Bono Counsel for Respondent

1 **CERTIFICATE OF SERVICE**

2 I, Caroline Matthews, CERTIFY

3 I am over the age of 18 and not a party to this matter. My business address is
4 120 Stevens Avenue, Solana Beach, CA 92075. On November 24, 2025, I served a
5 copy of this Application for TRO by email to the following individuals:

6 Mary Wiggins
7 Civil Docketing Clerk
8 U.S. Attorney's Office
9 880 Front Street, Suite 6293
10 San Diego, CA 92101
11 Email: Mary.Wiggins@usdoj.gov

12 Janet A. Cabral, Assistant U.S. Attorney
13 Chief, Civil Division
14 Southern District of California
15 U.S. Attorney's Office
16 880 Front Street, Suite 6293
17 San Diego, CA 92101
18 Email: Janet.Cabral@usdoj.gov

19 Erin Dimpleby, Assistant U.S. Attorney
U.S. Attorney's Office
880 Front Street, Suite 6293
San Diego, CA 92101
Email: erin.dimpleby@usdoj.gov

/s/Caroline G. Matthews
Caroline G. Matthews, Esq.
Pro Bono Counsel for Respondent