

1 Keli M. Reynolds (CA SBN 227650)
2 Olmos and Reynolds Law Group, LLP
3 315 West 9th Street, Suite 801
4 Los Angeles, CA 90015
5 TEL (323) 951-0144
6 FAX (323) 940-4406
7 keli@olmosandreynolds.com
8 Counsel for Petitioner

9 Sabrina Damast (CA SBN #305710 and NY SBN #5005251)
10 Law Office of Sabrina Damast, Inc.
11 510 West 6th Street, Suite 330
12 Los Angeles, CA 90014
13 Telephone: (323) 475-8716
14 Emails: sabrina@sabrinadamast.com

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Counsel for
Kevin Alexander Polanco Retana

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2 **UNITED STATES DISTRICT COURT**
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4 **FOR THE DISTRICT OF ARIZONA**
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6 KEVIN ALEXANDER POLANCO
7 RETANA,

8 Petitioner,
9

10 vs.

11 PAMELA BONDI, in her official
12 capacity as Attorney General; KRISTI
13 NOEM, in her official capacity as
14 Secretary of the Department of
15 Homeland Security; TODD M. LYONS,
16 in his official capacity as Current Acting
17 Director of Immigration and Customs
18 Enforcement; JOHN E. CANTU, in his
19 official capacity as Phoenix ICE Field
20 Office Director; WARDEN, Florence
21 Service Processing Center.

22 Respondents
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Case No.:

EX PARTE APPLICATION FOR
TEMPORARY RESTRAINING
ORDER

1 Pursuant to Rule 65(b) of the Federal Rules of Civil Procedure, Petitioner
2 Kevin Alexander Polanco Retana moves this Court for emergency relief in the form
3 of a temporary restraining order directing that she be immediately released from her
4 current confinement at the Florence Service Processing Center because his
5 detention for removal to a third country is illegal under the Immigration and
6 Nationality Act, the federal regulations, and the U.S. Constitution. This Application
7 and accompanying Memorandum of Points and Authorities, Petition for Writ of
8 Habeas Corpus, and by Declarations and Exhibits filed contemporaneously.

9 On November 22, 2025, counsel for Petitioner emailed Theo Nickerson of
10 the U.S. Attorney's Office in Phoenix, Arizona. Counsel provided a synopsis of the
11 claims being made in Petitioner's application. As of the filing of this application,
12 Ms. Nickerson has not responded to counsel's email.

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14 Dated: November 22, 2025

Respectfully Submitted,

15 /s/ Keli M. Reynolds
16 Keli M. Reynolds
17 Attorney for Petitioner
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