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6 UNITED STATES DISTRICT COURT
7 EASTERN DISTRICT OF CALIFORNIA
8 FRESNO DIVISION

9 Cristian Amaya-Quinteros,

10 Petitioner,

11 v.

12 CORECIVIC, INC., a Maryland corporation,
13 operating the California City Detention
14 Facility; Kristi NOEM, Secretary of the
15 Department of Homeland Security; Pamela
16 BONDI, U.S. Attorney General; in their
17 official capacity; Moises BECERRA, in his
18 official capacity as Field Office of
19 Immigration and Customs Enforcement,
20 Enforcement and Removal Operations.

21 Respondents.

) Case Number: 1:25-cv-01672-AC

) **PETITIONER'S NOTICE OF MOTION
) AND MOTION FOR PRELIMINARY
) INJUNCTION. [LOCAL RULE 230(b)]**

22 Please take notice that Petitioner respectfully moves this Court for a preliminary
23 injunction enjoining Respondents from detaining Petitioner and mandating his release from
24 detention related to his removal proceedings. This motion is based on the previously submitted
25 memorandum of law in support of Petitioner's amended injunction (ECF No. 17), exhibits in
26 support of his writ of habeas corpus (ECF No. 16, Exh. A-S), Petitioner's declaration on
27 irreparable injury accompanying this motion, and any evidence subsequently received by this
28 Court. A proposed order with a provision for bond also accompanies this motion.

Date: December 12, 2025

Respectfully Submitted,
/s/ Mario Salgado
Mario Salgado, Esq.

CERTIFICATE OF SERVICE

I, Mario Salgado, am over the age of 18 years and maintain a business address located at 605 Market Street Suite 1111 in San Francisco, California 94105. I mailed the **PETITIONER'S NOTICE OF MOTION AND MOTION FOR PRELIMINARY INJUNCTION. [LOCAL RULE 230(b)]** to:

1. CORECIVIC, INC. Attn: Amanda Garcia, Registered Corporate Agent Authorized Employee, located at 330 N. Brand Blvd, Glendale, CA 94203
2. Kristi NOEM, Secretary of the Department of Homeland Security, Office of the General Counsel; U.S. Department of Homeland Security; 245 Murray Lane, SW; Mail Stop 0485; Washington, D.C. 20258-0485.
3. Pamela BONDI, U.S. Attorney General, U.S. Department of Justice; 950 Pennsylvania Avenue, NW; Washington, D.C. 20530-0001 Civil Process Clerk & United States Attorney's Office for the Eastern District of California; 2500 Tulare Street, Suite 4401, Fresno, CA 93721.
4. Moises BECERRA, Field Office of Immigration and Customs Enforcement, Enforcement and Removal Operations, Department of Homeland Security, Office of the General Counsel; U.S. Department of Homeland Security; 245 Murray Lane, SW; Mail Stop 0485; Washington, D.C. 20258-0485.

I also electronically filed the above referenced document to the court's filing system. I swear under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: December 12, 2025

/s/ Mario Salgado
Mario Salgado, Esq.