

1 Cara Jobson, 218400
2 Wiley & Jobson, LLP
3 PO Box 459
4 Berkeley, CA 94701
5 cara@wileyjobson.com
6 (415) 627-9161

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8
9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA
11

12 Komalpreet Kaur,

13
14 Petitioner,

15 vs.

16 United States Department of Homeland
17 Security, et al

18 Respondents
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22

) Case No.: 1:25-cv-01726-TLN-SCR

) PETITIONER'S EMERGENCY
) APPLICATION FOR TEMPORARY
) RESTRAINING ORDER AND ORDER
) TO SHOW CAUSE RE:
) PRELIMINARY INJUNCTION

) Oral Argument Requested

) Proposed Hearing date: 12/18/2025
) Time: 10 am
) Courtroom 27, 8th floor

1 For the reasons explained in the accompanying Memorandum of Points and
2 Authorities, Petitioner hereby makes this *Ex Parte* Application for Temporary
3 Restraining Order and Order to Show Cause Re: Preliminary Injunction pursuant to
4 Federal Rule of Civil Procedure 65 and 5 U.S.C. § 705. Petitioner moves for a
5 temporary restraining order enjoining Respondents from violating Petitioner's due
6 process rights and violating statutory and regulatory requirements for arrest and
7 detention under the INA. Specifically, the Petitioner seeks an order (i) enjoining
8 Respondents from continuing to detain Petitioner and ordering her immediate release
9 from detention, and (ii) enjoining Respondents from re-detaining Petitioner subject to
10 further order. This motion is based upon Federal Rule of Civil Procedure 65, the
11 incorporated memorandum of points and authorities, and the simultaneously filed
12 Petition for Writ of Habeas Corpus and exhibits.
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18 Undersigned counsel has conferred with counsel for Respondents, who
19 requested three days to respond to this motion, and undersigned counsel agrees that
20 three days is reasonable.
21

22 Dated: December 12, 2025

Respectfully submitted,

23
24 /s/ Cara Jobson
25 Attorney for Petitioner
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3 **I. INTRODUCTION**

4 Petitioner Komalpreet Kaur brings this habeas petition seeking relief pursuant to
5 statutory, regulatory, and due process protections after being re-detained by
6 Respondents without any notice or process and without any change in circumstances
7 since being released on humanitarian grounds a year ago. Petitioner is three months
8 pregnant and experiencing serious medical complications. She has an application for
9 asylum pending through which she was granted a work authorization valid for five
10 years.
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13
14 Petitioner meets all factors for emergency relief. First, Petitioner is likely to
15 succeed on her statutory and constitutional claims because Respondents' re-detention
16 of Petitioner exceeds Respondents' authority, is procedurally flawed, and violates due
17 process. Second, Petitioner faces irreparable harm if a TRO is not granted, including
18 continued detention and deteriorating health conditions that endanger her pregnancy
19 and her baby. Third, the balance of interests sharply favors Petitioner, since enjoining
20 Respondents merely preserves the status quo while imposing little burden on the
21 government. Fourth, the public interest is served by ensuring that the government
22 complies with the law, that taxpayers are not burdened with unnecessary expense of
23 detaining individuals who do not pose a flight risk or danger to the community, and
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1 that pregnant mothers and their unborn U.S. citizen children receive adequate health
2 care.

3 4 **II. STATEMENT OF FACTS**

5 The following facts are supported by the Petition for Writ of Habeas Corpus and
6 accompanying exhibits.

7
8 Kaur is a 23-year-old native and citizen of India who is currently pregnant. She
9 entered the United States without inspection on or about December 7, 2024, and was
10 apprehended and detained by DHS near Tecate, Mexico. She was then released on her
11 own recognizance on humanitarian grounds and ordered to appear at a future hearing.
12

13 On or about February 10, 2025, Petitioner filed a form I-589, Application for
14 Asylum and Withholding, with an immigration judge of the Executive Office of
15 Immigration Review, and her case was calendared for a future date. That application
16 remains pending.
17
18

19 Kaur has no criminal record. U.S. Citizenship and Immigration Services granted her
20 an Employment Authorization Document (“work permit”) valid for five years, until
21 August 10, 2030.
22

23 On October 6, 2025, almost a year after releasing Kaur from custody, after issuing a
24 work authorization document and after her asylum application was pending for a
25 number of months and awaiting a final hearing on the merits, ICE re-arrested
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1 Petitioner. She was arrested when she appeared for a check-in at the San Jose ICE
2 office.

3
4 Petitioner is experiencing serious medical issues with her pregnancy. She has lost
5 weight while in detention and has elevated bilirubin levels. Both of these conditions
6 are strongly associated with poor fetal outcome. She has already necessitated
7 emergency care. The conditions in California City Detention Facility are unhealthy in
8 terms of sanitation, temperature, nutrition and medical care. The safety of Petitioner
9 and her baby is endangered by her detention.
10
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12 III. JURISDICTION AND LEGAL STANDARD

14 Under Ninth Circuit law, courts employ identical standards to evaluate whether to
15 issue a temporary restraining order or a preliminary injunction. See *Stuhlberg Int'l*
16 *Sales Co. v. John D. Brush & Co.*, 240 F.3d 832, n. 7 (9th Cir. 2001), and *McCarthy v.*
17 *Servis One, Inc.* 2017 WL 89422, *4 (N.D. Cal. Mar, 7, 2017). Accordingly, a movant
18 must demonstrate (1) a likelihood of success on the merits--or, alternatively, raise
19 serious questions regarding the merits under a sliding-scale approach; (2) a likelihood
20 of harm to the movant in the absence of preliminary relief; (3) that the balance of
21 equities tips in the movant's favor; and (4) that granting the TRO is in the public
22 interest. *Alliance for the Wild Rockies v. Cottrell*, 632 F.3d 1127, 1131-32 (9th Cir.
23 2011); *Stormans, Inc. v. Selecky*, 586 F.3d 1109, 1127 (9th Cir. 2009); *Winter v. Nat.*
24 *Res. Def. Council, Inc.*, 555 U.S. 7 (2008). Moreover, when the government is the
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1 opposing party, the assessment of harm to the opposing party and weighing the public
2 interest merge and are considered together. *Nken v. Holder*, 556 U.S. 418, 435 (2009).

3
4 Alternatively, in the Ninth Circuit, courts can also apply a "sliding scale" approach:
5 if the movant can show that there are serious questions going to the merits -a lesser
6 showing than likelihood of success on the merits -then a temporary restraining order
7 or preliminary injunction may still issue if the balance of hardships tips sharply in the
8 plaintiff's favor, and the other two factors are satisfied. *Alliance for the Wild Rockies*
9 *v. Cottrell*, 632 F.3d 1127, 1131-32 (9th Cir. 2011).

12 IV. ARGUMENT

13 A. Petitioner is Likely to Succeed on the Merits Due to the Respondents' Violations 14 of Her Due Process Rights and of Statutory and Authority Regarding Detention 15 and Re-Detention.

16 1. *Respondents Violated the INA by Subjecting Petitioner to Mandatory* 17 *Detention.*

18 The mandatory detention provision at 8 U.S.C. § 1225(b)(2) does not apply to
19 all noncitizens residing in the United States who are subject to the grounds of
20 inadmissibility. As relevant here, it does not apply to those who entered the country
21 without inspection. Such noncitizens are detained under § 1226(a), unless they are
22 subject to § 1225(b)(1), § 1226(c), or § 1231. The application of § 1225(b)(2) to
23 Petitioner unlawfully mandates her continued detention and violates the INA.
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26 Section 1225 provides for mandatory detention of certain individuals, while
27 Section 1226 establishes a discretionary detention scheme. Section 1225 provides that
28

1 a noncitizen “who is an applicant for admission . . . shall be detained.” 8 U.S.C. §
2 1225(b)(2)(A). In contrast, under Section 1226’s discretionary scheme, a noncitizen
3 “may be arrested and detained pending a decision on whether the [noncitizen] is to be
4 removed from the United States.” 8 U.S.C § 1226(a). Pending this decision, the
5 Attorney General may continue to detain the arrested individual or may release the
6 individual on bond or conditional parole. 8 U.S.C § 1226(a)(2)(A)–(B).
7
8

9 Courts in this Circuit have found that Section 1225 applies to those apprehended
10 as an “arriving alien” to the United States while Section 1226 applies to those already
11 within the United States and charged as entry without inspection. *See, e.g., Rodriguez*
12 *Vazquez v. Bostock*, 779 F. Supp. 3d 1239, 1257 (W.D. Wash. 2025) (finding petitioner
13 likely to succeed on merits of argument that 1225(b)(2)(A) “should be read to narrow
14 mandatory detention under that subsection to noncitizens who are apprehended while
15 seeking to enter the country, and that noncitizens already residing in the United States,
16 including those who are charged with inadmissibility, continue to fall under the
17 discretionary detention scheme in Section 1226”) (internal quotation marks omitted);
18 *See also, Garcia Mariagua v. Chestnut*, No. 1:25-cv-01744-DJC-CSK 2025 WL
19 3551700(E.D. Cal Dec. 11, 2025)(Considering similar facts); *Alva v. Noem*, No. 1:25-
20 cv-01600-DJC-CSK, 2025 WL 3281211(E.D. Cal Nov. 25, 2025)(Considering similar
21 facts.).
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1 Respondents’ interpretation of these provisions would similarly render recent
2 amendments to this statute surplusage. In 2025, Congress enacted the Laken Riley Act,
3 which added additional categories of individuals to those subject to mandatory
4 detention under Section 1226(c). Congress would have no need to enact these
5 amendments subjecting new individuals to mandatory detention if they were already
6 subject to such detention pursuant to Section 1225. *See Garcia v. Noem*, No. 25-cv-
7 02180-DMS-MMP, 2025 WL 2549431, at *6 (S.D. Cal. Sept. 3, 2025) (“assuming any
8 inadmissible noncitizen is an ‘applicant for admission’ who is ‘seeking admission’
9 (and, therefore, subject to mandatory detention under § 1225(b)(2)), would render the
10 Riley Laken Act unnecessary”).

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15 Finally, this interpretation is consistent with longstanding agency practice. Until
16 recently, the Department of Homeland Security (“DHS”) consistently treated
17 noncitizens apprehended after entering without inspection. Section 1226(a). *See*
18 *Rodriguez v. Bostock*, 779 F. Supp. 3d at 1258, 1260–61. Executive Branch regulations
19 implementing these provisions issued just six months after their enactment provide that
20 “[d]espite being applicants for admission, [noncitizens] who are present without
21 having been admitted or paroled (formerly referred to as [noncitizens] who entered
22 without inspection) will be eligible for bond and bond determination.” 62 Fed. Reg.
23 10312, 10323 (Mar. 6, 1997). As this interpretation “was issued roughly
24 contemporaneously with the enactment of the statute and remained consistent over
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1 time,” this “longstanding practice of the government—like any other interpretive aid
2 —can inform a court’s determination of what the law is.” *Loper Bright Enters. v.*
3 *Raimondo*, 603 U.S. 369, 386 (2024) (cleaned up).

4
5 Petitioner was apprehended after entering without inspection. She was not an
6 “arriving alien” nor was she charged as one in the Notice to Appear. She is not subject
7 to mandatory detention. Her only remedy is to seek relief from this Court.

8
9 *2. Respondents Violated Petitioner’s Due Process Rights by Re-Detaining*
10 *Petitioner without Any Notice and With No Change in Circumstances.*

11 When the government releases an individual from physical restraint, that individual
12 gains a constitutionally protected interest in his “continued liberty.” *Morrissey v.*
13 *Brewer*, 408 U.S. 471, 482 (1972). The government may not unilaterally take that
14 liberty away, but rather typically the Constitution requires some kind of a hearing
15 *before* the [government] deprives a person of liberty.” *Zinermon v. Burch*, 494 U.S.
16 113, 127 (1990)(emphasis in original.)

17
18 A procedural due process claim involves two steps: “the first asks whether there
19 exists a protected liberty interest under the Due Process Clause, and the second
20 examines the procedures necessary to ensure any deprivation of that protected liberty
21 interest accords with the Constitution.” *Fernandez Lopez v. Wofford*, 2025 WL
22 2959319, *3 (E.D. Cal. 2025) (internal quotation marks omitted). “(D)ue process is
23 flexible and calls for such procedural protections as the particular situation demands.”
24 *Morrissey v. Brewer*, 408 U.S. 471, 481, 92 S.Ct. 2593, 2600 (1972). To determine
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1 what protections due process demands in a given situation, courts consider three
2 factors: (1) the private interest that will be affected by the official action; (2) the risk of
3 erroneous deprivation of such interest through the procedures used, and the probable
4 value of additional safeguards; and (3) the government's interest, including the
5 function involved and the burdens that would be imposed by additional process. See
6 *Mathews v. Eldridge*, 424 U.S. 319, 335, 96 S.Ct. 893, 903 (1976).
7

8
9 **(a) The Petitioner has a protected private interest, her liberty, in remaining
10 out of custody.**

11 The Supreme Court has held that individuals have a liberty interest under the
12 Due Process Clause of the Fifth Amendment in avoiding re-incarceration. *See Young v.*
13 *Harper*, 520 U.S. 143, 146-152 (1997) (holding that individuals released from custody
14 under a pre-parole program created to reduce prison overcrowding have a
15 constitutionally protected liberty interest requiring pre-deprivation process). While
16 “the initial decision to detain or release an individual may be within the government’s
17 discretion, the government’s decision to release an individual from custody creates ‘an
18 implicit promise,’ upon which that individual may rely, that their liberty ‘will be
19 revoked only if they fail to live up to the... conditions of release.’” *Pinchi v. Noem*, 792
20 F.Supp.3d 1025, 1032 (N.D. Cal. 2025) (alteration marks omitted).
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25 Here, Petitioner’s release was a promise that her liberty would not be revoked
26 unless she failed to live up to the conditions of her release. Petitioner has a protected
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1 liberty interest in remaining out of custody absent a showing that she poses a flight risk
2 or danger to the community.

3
4 Moreover, her liberty interest strengthened with time and reliance. She has been
5 released from custody for a year and filed an application for asylum and anticipated
6 having her merits heard. She also received work authorization.

7
8 Given the civil context of immigration proceedings, Petitioner's liberty interest is even
9 greater. Immigration detention should not be used as punishment and should only be
10 used when, under an individualized determination, a noncitizen is a flight risk or a
11 danger to the community. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

12
13 Petitioner's liberty was a protected private interest warranting due process protection.

14
15 **(b)The risk of erroneous deprivation of such interest through the**
16 **procedures used is high and requires additional safeguards.**

17 Under the circumstances, due process requires that respondents provide
18 petitioner with notice and a pre-deprivation bond hearing prior to re-detaining her.
19 *Fernández López*, 2025 WL 2959319 at *6 (“Given the absence of any procedural
20 safeguards to determine if her re-detention was justified, the probable value of
21 additional procedural safeguards, i.e., a bond hearing, is high.”); *Pinchi*, 792 F.Supp.3d
22 at 1035 (“[I]t is clear that there is a significant risk that the government will
23 erroneously deprive Ms. Garro of that liberty interest if it does not provide her with a
24 pre-detention hearing.”); *Valdez v. Joyce*, 2025 WL 1707737, *4 (S.D.N.Y. 2025) (“In
25 the context of revocation of civil release, an individual whose release is sought to be
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1 revoked is entitled to due process such as notice of the alleged grounds for revocation,
2 a hearing, and the right to testify at such a hearing.”) (internal quotation marks
3 omitted).

4
5 There is no evidence that any procedural safeguards whatsoever were employed
6 when Respondents re-detained Petitioner. Accordingly, the risk of erroneous
7 deprivation of her liberty interest is high.

8
9 **(c) Respondents’ interest does not outweigh the first two factors.**

10
11 Respondents’ interest in detaining Petitioner is limited to whether she is a flight
12 risk or dangerous to the community. There is zero evidence that either of those factors
13 are at play here, nor that they were even evaluated. Petitioner has appeared to all
14 immigration court hearings. She has availed herself of the court by applying for
15 asylum. She was arrested when she presented herself to ICE authorities according to
16 their instruction. Petitioner has no criminal arrest history. Respondents’ interest does
17 not outweigh Petitioner’s liberty interest or the risk of erroneous deprivation of that
18 interest.
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22 The *Mathews* factors favor Petitioner, and accordingly she has shown a
23 likelihood of success on the merits of her procedural due process claim.

24
25 ***3. Petitioner is Likely to Succeed on the Merits Due to Respondents’ Violation of***
26 ***Statutory and Regulatory Procedures Regarding Re-Detention.***

27 Upon Petitioner’s initial encounter with ICE Petitioner was issued a form I-213
28 which indicated that she was being released for “humanitarian reasons.” This appears

1 to be a release under 8 C.F.R. § 212.5(a), which permits an alien to be released either
2 for humanitarian reasons or public benefit. The parole under 8 C.F.R. § 212.5(a) may
3 be terminated upon notice to the alien and “upon accomplishment of the purpose for
4 which parole was authorized.” 8 C.F.R. § 212.5(e)(2)(i). No such showing has been
5 made here.
6

7
8 Arrest pursuant to 8 USC §1226(a) provides that “upon ‘warrant issued’ an
9 individual may be arrested and detained during removal proceedings. When a
10 noncitizen is detained by ICE, the proscribed procedure is that ICE issues an arrest
11 warrant pursuant to 8 C.F.R. § 236.1(b), on a form I-200. In addition, a form I-286,
12 Notice of Custody Determination, is to be issued to the individual by certain
13 enumerated immigration officials. 8 C.F.R. § 236.1(g). It is unclear from the record
14 available whether any of these procedures were properly followed.
15
16

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18 *4. Petitioner is Likely to Succeed on the Merits as Respondents’ Detention of*
19 *Petitioner Violates Its Own Policies Regarding Pregnant Women and Also*
20 *Violates Substantive Due Process.*

21 Respondents’ detention of Petitioner is in violation of their own policy and is
22 arbitrary and capricious.

23 Petitioner is three months pregnant. Respondents’ detention of Petitioner
24 violates its own policy. See ICE, Directive: Identification and Monitoring of Pregnant,
25 Postpartum, or Nursing Individuals (2021): [https://www.ice.gov/directive-](https://www.ice.gov/directive-identification-and-monitoring-pregnant-postpartum-or-nursing-individuals)
26 [identification-and-monitoring-pregnant-postpartum-or-nursing-individuals](https://www.ice.gov/directive-identification-and-monitoring-pregnant-postpartum-or-nursing-individuals) (2021).
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28

1 That policy states, “[g]enerally, ICE should not detain, arrest, or take into custody for
2 an administrative violation of the immigration laws known to be pregnant, postpartum,
3 or nursing unless release is prohibited by law or exceptional circumstances exist” and
4 that “ICE officers and agents should carefully weigh the decision to issue a detainer,
5 arrest or take into custody for an administrative violation of the immigration laws an
6 individual who is known to be pregnant, postpartum, or nursing.”¹ Detaining Petitioner
7 in disregard of its own directive is arbitrary and capricious and a violation of the
8 Administrative Procedures Act. This violation is exacerbated by Petitioner’s
9 compromised medical condition and the poor conditions at California City.
10
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13 “[S]ubstantive due process prevents the government from engaging in conduct
14 that shocks the conscience or interferes with rights implicit in the concept of ordered
15 liberty.” *United States v. Salerno*, 481 U.S. 739, 746 (1987). Respondent is pregnant,
16 has lost weight, has elevated bilirubin levels, and has already required emergency
17 treatment. Weight loss in pregnancy is associated with adverse fetal outcome,
18 including “low birth rate,” “baby’s risk for illness early on and for long-term health
19 problems later. It also increases [baby’s] risk of physical and mental disabilities.”²
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25 ¹ The regulations that permit parole under 8C.F.R. 212.(b)(2) also recognizes pregnancy as a
26 humanitarian factor and special circumstance for release from immigration detention.

27 ² <https://healthy.kaiserpermanente.org/health-wellness/health-encyclopedia/he.pregnancy-healthy-weight-gain.abp4805>
28

1 Elevated bilirubin is associated with “adverse infant outcomes, including stillbirths,
2 fetal malformations, neonatal deaths, and small for gestational age births.”³

3
4 The conditions in the California City Detention Facility are abysmal,
5 particularly with regard to medical care, sanitation, nutrition, and temperature.⁴ In *Doe*
6 *v. Chestnut*, 2025 WL 3240400, (2025), the court found a substantive due process
7 violation in an immigration detention case in California City where the uncontested
8 evidence described the facility as “dirty and unhygienic,” “covered in dust and grime,”
9 lacking clean water, and failing to timely provide medication. Petitioner has not
10 received sufficient food or clean water. The water she has received tastes like bleach
11 or detergent. Ex. A.

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14
15 All evidence of record indicates that Petitioner is not receiving adequate medical
16 care nor nutrition, putting her health and that of her baby at risk. Given the easily
17 available Alternatives to Detention available to Respondents, such as the reporting
18 requirements that Petitioner was already complying with prior to her re-detention, her
19 incarceration at California City while pregnant and medically compromised is a
20 substantive due process violation.
21

22
23 **B. Petitioner has Established that She Will be Irreparably Harmed Absent a**
24 **Temporary Restraining Order.**

25 ³ <https://pubmed.ncbi.nlm.nih.gov/27586034/>

26 ⁴ Sam Levin, “‘Hell on earth’: immigrants held in new California detention facility beg for help | US
27 immigration | The Guardian.” THE GUARDIAN. Sep. 27, 2025. See also, Rachel Uranga, “Why
28 California’s newest detention facility faces federal lawsuit over medical neglect and ‘punitive’
unsanitary conditions.” L.A. TIMES, Nov. 13, 2025.

1
2 The unlawful deprivation of liberty “is a severe form of irreparable injury.”
3
4 *Ferrara v. United States*, 370 F. Supp 2d 351, 360 (D. Mass 2005). The misapplication
5 of section 1225(b) causes “immediate and irreparable injury.” *Maldonado Bautista v.*
6 *Santacruz*, No. 5:25-cv-01874-SSS-BFM (C.D. Cal. July 28, 2025).
7

8 In addition, violations of due process rights *per se* constitute irreparable harm.
9 *Hernandez v. Sessions*, 872 F.3d 976, 994 (9th Cir. 2017) (“It is well established that
10 the deprivation of constitutional rights unquestionably constitutes irreparable injury.”
11 (interior citations omitted). Because Petitioner demonstrates a likely due process
12 violation, irreparable harm is presumed.
13
14

15 C. The Balance of Equities and Public Interest Tip Sharply in Petitioner’s Favor.

16 When the government is the nonmoving party, “the last two Winter factors
17 merge.” *Baird v. Bonta*, 81 F.4th 1036, 1040 (9th Cir. 2023) (internal citations
18 omitted).
19

20 On Petitioner's side, the harm of continued and indefinite detention is drastic.
21 Petitioner is pregnant and separated from her family. On Respondent’s side, a TRO
22 imposes minimal burden. Respondents in this matter had already determined that
23 Petitioner’s initial release was appropriate when she first entered the United States a
24 year ago. Returning Petitioner to the original status quo does not pose a hardship to the
25 Respondents.
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1 The public interest also weighs in Petitioner’s favor, as the public “has a strong
2 interest in upholding procedural protections...and the Ninth Circuit has recognized that
3 the costs to the public of immigration detention are staggering.” *Diaz v. Kaiser*, No.
4 3:25-CV-05071, 2025 WL 1676854, at *3 (N.D. Cal. June 14, 2025) (citing *Jorge*
5 *M.F. v. Wilkinson*, No. 21-CV-01434-JST, 2021 WL 783561, at *3) (N.D. Cal. Mar. 1,
6 2021). Moreover, the public interest favors permitting mothers and their unborn
7 children to receive proper prenatal care.
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11 **D. No Security Bond or a Nominal Bond Is Appropriate.**

12 Under Federal Rule of Civil Procedure 65(c), courts have wide discretion in setting the
13 security amount. Where, as here, the litigation enforces important constitutional rights,
14 courts often waive or impose only nominal bond. Respondents face no financial harm
15 here, and \$0 bond is appropriate.
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18 **V. CONCLUSION**

19 For all the foregoing reasons, Petitioner respectfully requests that the Court grant this
20 Motion for a Temporary Restraining Order and:
21

- 22 1. Enjoin Respondents from continued incarceration of Petitioner;
- 23 2. Order Respondents to immediately release Petitioner;
- 24 3. Enjoin Respondents from re-detaining Petitioner without a showing of change of
25 circumstances;
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- 1 4. Enjoin Respondents from adding any additional conditions to Petitioner's parole
2 including an ankle monitor or restraints on her movement without a pre-
3 deprivation hearing before a neutral arbiter;
- 4 5. Enjoin the Respondents from re-detaining Petitioner without no less than seven
5 (7) days' notice and a pre-deprivation bond hearing before a neutral arbiter.
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- 7 6. Waive the requirement for security under Fed. R. Civ. P. 65(c).
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10 Dated: December 12, 2025

Respectfully submitted,
11 /s/ Cara Jobson
12 Attorney for Petitioner
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