

Eriawan Ngadiman, *Pro Se*
A [REDACTED]
Adelanto Detention Center
10250 Rancho Road
Adelanto, CA 92301

Fee Due
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CENTRAL DISTRICT OF CALIFORNIA
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**United States District Court
For the Central District of California**

Eriawan Hovinen Ngadiman,
Petitioner,
v.
Kristi Noem, et al.
Respondents.

No. *EDCV25-3289-CV(PD)*
**Motion for a Preliminary Injunction
and for a Temporary Restraining
Order**

Simultaneously with this document, Petitioner has filed a petition for a writ of habeas corpus under 28 U.S.C. § 2241. Because he is almost certain prevail on at least one of his claims, he respectfully asks the Court to order his immediate release from custody while this case is litigated.

“A plaintiff seeking a preliminary injunction must establish that he is likely to succeed on the merits, that he is likely to suffer irreparable harm in the absence of preliminary relief, that the balance of equities tips in his favor, and that an injunction is in the public interest” *Planned Parenthood Great Northwest v. Labrador*, 122 F.4th 825, 843-44 (9th Cir. 2024) (quoting *Alliance for the Wild Rockies v. Cottrell*, 632 F.3d 1127, 1131 (9th Cir. 2011)). “Alternatively, a preliminary injunction may issue where serious questions going to the merits were raised and the balance of hardships tips sharply in plaintiff’s favor if the plaintiff also shows that there is a likelihood of irreparable injury and that the injunction is in the public interest.” *Id.* At 844 (quoting *Alliance for the Wild Rockies*, 632 F.3d 1135). The standards for granting a temporary restraining order are same as the standards for granting a preliminary injunction, *See O.M. v. Nat’l Women’s Soccer League, LLC*, 541 F. Supp. 3D 1171, 1177 (D. Or. 2021).

First, Petitioner is almost certain to succeed on the merits of his habeas petition for the reasons set forth in his petition.

Second, illegal confinement is quintessentially irreparable harm, because “the deprivation of constitutional rights unquestionably constitutes irreparable injury.” *Melendres v. Arpaio*, 695 F.3d 990, 1002 (9th Cir. 2012).

Third, and finally, when the government is a party, as it is here, “the balance of equities and public interest factors merge.” *Pimentel-Estrada v. Bar*, 464 F. Supp. 3D 1225, 1237 (W.D. Wash. 2020) (citing *Drakes Bay Oyster Co. v. Jewell*, 747 F.3d 1073, 1092 (9th Cir. 2014)). The risk of harm to Petitioner far outweighs the government's interest in illegally detaining him, for it is “always in the public interest to prevent the violation of a party’s constitutional rights.” 695 F.3d at 1002.

Therefore, the Court should grant a preliminary injunction and temporary restraining order, and order Petitioner’s immediate release from custody.

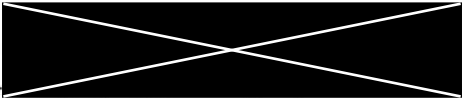
Additionally, the second claim in Petitioner’s petition concerns possible deportation to a third country. Petitioner respectfully requests that the Court order the government not to deport Petitioner to a third country until the Court resolves the pending petition.

Respectfully submitted,

Dated: December 1, 2025

By: Eriawan H Ngadinan
Eriawan H Ngadinan Petitioner Pro Se

Erwan Njardman
(Name of alien or aliens)

A 
("Alien number" of alien or aliens)

CERTIFICATE OF SERVICE

On _____, I, _____,
(date) (printed name of person signing below)

served a copy of this _____,
(name of document)

and any attached pages to _____
(name of party served)

at the following address: _____
(address of party served)

by _____
(method of service, for example overnight courier, hand-delivery, first class mail)

(signature)

(date)

December 1, 2025.

Dear Sir or Madam,

Please include this motion with my Habeas Corpus
that I submitted last week. Thank you and

Happy Holidays! 😊

Respectfully,

Gerrard Nnadman.
A. 