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7 Counsel for Petitioner
8 Viktor Lazarev

9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 Viktor Lazarev,
12 Alien # 

Case No. 5:25-cv-03307

13 *Petitioner,*

14 v.

15 Pam Bondi, U.S. Attorney General;

16 Kristi Noem, Secretary of the U.S.
17 Department of Homeland Security;

18 Fereti Semaia, Warden of Adelanto ICE
19 Processing Center;

20 Ernesto Santacruz Jr., Acting ICE Field
21 Office Director of the Los Angeles Field
22 Office,

23 *Respondents*
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PETITIONER'S
APPLICATION FOR
TEMPORARY
RESTRAINING ORDER
AND ORDER TO SHOW
CAUSE

1 Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure, Petitioner
2 hereby moves the Court for emergency relief in the form of a temporary restraining
3 order directing Respondents to release Petitioner from their custody or to provide
4 Petitioner with a constitutionally compliant individualized bond hearings before an
5 immigration judge pursuant to 8 U.S.C. § 1226(a) within seven days of issuance of
6 an Order.
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9 Petitioner further moves for the issuance of an order to show cause as to why
10 a preliminary injunction should not issue.
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12 **RESPECTFULLY SUBMITTED this 8th day of December, 2025**

13 /s/ Mackenzie Mackins
14 Mackenzie Mackins
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20 **ATTORNEY FOR PETITIONER**
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CERTIFICATE OF COUNSEL

Pursuant to Rule 65(b)(1)(B) of the Federal Rules of Civil Procedure and L.R. 65-1, I hereby certify that on December 8, 2025, I emailed David M. Harris, Chief of the Civil Division, U.S. Attorney’s Office, Central District of California. I provided a copy of the Application for a Temporary Restraining Order and Petition for Writ of Habeas Corpus to Mr. Harris by emailing copies to David.M.Harris@usdoj.gov.

Dated: December 8, 2025

Respectfully submitted,

/s/ Mackenzie Mackins
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 8, 2025, I served a copy of this Petition for Writ of Habeas Corpus by email to the following individual:

David M. Harris
Chief of the Civil Division
U.S. Attorney's Office
300 N. Los Angeles St., Ste. 7516
Los Angeles, CA 90012-3341
Email: David.M.Harris@usdoj.gov

s/ Mackenzie Mackins
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