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(Pro Hac Vice Application to be filed)

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

QIANCHENG ZHAO,

Petitioner,

v.

WARDEN OF THE ERO EL PASO EAST
MONTANA; TODD LYONS, Acting
Director of Immigration and Customs
Enforcement; KRISTI NOEM, Secretary of
the U.S. Department of Homeland Security;
PAMELA BONDI, Attorney General of the
United States.

Respondents.

Docket No. 3:25-cv-00635

**NOTICE OF MOTION FOR
TEMPORARY RESTRAINING
ORDER AND PRELIMINARY
INJUNCTION**

PLEASE TAKE NOTICE that, as soon as thereafter as counsel may be heard, the law office of Ling Li moves for temporary restraining order and preliminary injunction pursuant to Federal Rule of Civil Procedure 65; and

PLEASE TAKE FURTHER NOTICE that, counsel shall rely on the accompanying Declaration of Ling Li., accompanying exhibits, and memorandum of law, in support of this motion; and

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that a courtesy copy of this filing was emailed to the U.S. Attorney's Office after it was filed electronically.

Respectfully submitted,

Date: December 9, 2025

Law Office of Ling Li, P.C.
Attorney for Petitioner

/s/: Ling Li
Ling Li, Esq.