



1 PRO SE

2

3

4

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

5

6 SAGASTEGUI-RONCEROS LUIGUIE
7 MARTIN,

7

8

Petitioner,

9

v.

10

11 FERETI SEMAIA, in official capacity, Facility
12 Administrator of Adelanto ICE Processing
Center; et al.,

13

Respondents.

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

29

CASE NO. **5:25-CV-03324-SVW-BFM**

**PETITIONER'S NOTICE OF MOTION
AND EX PARTE MOTION FOR
TEMPORARY RESTRAINING ORDER**

1 **NOTICE OF MOTION AND MOTION**

2 PLEASE TAKE NOTICE as soon as it may be heard in the United States District Court for the
3 Central District of California, that Petitioner "Sagastegui-Roncero Luiguie Martin" will and hereby
4 does move for a temporary restraining order pursuant to Federal Rule of Civil Procedure 65(b) and
5 Civil Local Rule 65-1. Because Petitioner's detention violates the Due Process Clause of the Fifth
6 Amendment to the United States, Petitioner respectfully requests that this Court (1) order Petitioner's
7 immediate release from Respondent's custody pending these proceedings, without requiring bond or
8 electronic monitoring, or, in the alternative, (2) order Petitioner's immediate release from
9 Respondent's custody and, within 14 days, order a pre-deprivation bond hearing before the Adelanto
10 Immigration Court, where Respondents shall bear the burden of proof to show, by clear and
11 convincing evidence, that Petitioners are a danger or a flight risk. To preserve this Court's jurisdiction,
12 Petitioner further seek an order enjoining Respondents from transferring Petitioner out of this District
13 or deporting them during the pendency of the underlying proceedings.

14 This motion is based on this Notice of Motion and Motion; the accompanying Memorandum of
15 Points and Authorities; the supporting declarations, the papers, evidence, and records on file in this
16 action; and any other written or oral evidence or argument as may be presented at or before the time
17 this motion is heard by the Court. This motion is also supported by the Petition for Writ of Habeas
18 Corpus (ECF No. 1).

19 Consistent with Civil L.R. 65-1, Petitioner seek relief at the earliest possible opportunity.
20 Petitioners are filing this motion the same day they filed their Petition for Writ of Habeas Corpus.

21 Pursuant to Civil L.R. 65-1 (a)(5), and as detailed further in the Declaration of PETITIONER, I
22 mailed a copy of the filed petition to Counsel for Respondents and advised that a Motion for TRO
23 would be forthcoming. Petitioner also mailed Counsel for Respondents a copy of the Memorandum of
24 Points and Authorities shortly before filing it. As of this filing, Respondents have not stipulated to a
25 TRO.

26
27
28
29

1 Date: 12/04/2025

Respectfully Submitted,

2

3

NAME: Sagastegui-Ronceros Luiguie Martin (A-)

4

ADDRESS: 10250 Rancho Road, Adelanto, CA 92301

5

Dorm: 

6

PRO SE

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

29