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5 *Attorney for Petitioner*

6 **UNITED STATES DISTRICT COURT**  
7 **CENTRAL DISTRICT OF CALIFORNIA**  
8 **EASTERN DIVISION**

9 VAGHARSHAK SARGYSAN

10  
11 Petitioner,

12 v.

13 PAM BONDI, et al.,

14 Respondents.  
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CASE NO. 5:25-cv-03341

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

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

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**NOTICE OF MOTION AND MOTION**

PLEASE TAKE NOTICE as soon as it may be heard in the United States District Court for the Central District of California, that Petitioner VAGHARSHAK SARGYSAN will and hereby does move for a temporary restraining order pursuant to Federal Rule of Civil Procedure 65(b) and Civil Local Rule 65-1. Because Petitioner's detention violates the Due Process Clause of the Fifth Amendment to the United States, Petitioner respectfully request that this Court (1) order Petitioner's immediate release from Respondents' custody pending these proceedings, without requiring bond or electronic monitoring, or, in the alternative, (2) order Petitioner's immediate release from Respondents' custody and, within 14 days, order a bond hearing before the Adelanto Immigration Court, where Respondents shall bear the burden of proof to show, by clear and convincing evidence, that Petitioner is a danger or a flight risk. To preserve this Court's jurisdiction, Petitioner furthers seek an order enjoining Respondents from transferring Petitioner out of this District or deporting him during the pendency of the underlying proceedings.

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

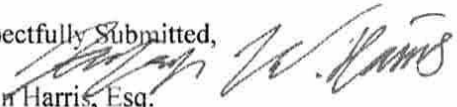
Consistent with Civil L.R. 65-1, Petitioner seeks relief at the earliest possible opportunity. Petitioner is filing this motion shortly after he filed his Petition for Writ of Habeas Corpus.

Pursuant to Civil L.R. 65-1(a)(5), and as detailed further in the Declaration of Kevin Harris, Counsel for Petitioner emailed a copy of the filed petition to Counsel for Respondents and advised that a Motion for TRO would be forthcoming.

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Date: December 19, 2025

Respectfully Submitted,

  
Kevin Harris, Esq.  
Friedman Law Firm  
3947 Lennane Drive, Suite 150  
Sacramento, CA 95834  
*Attorney for Petitioner*

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

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*Attorney for Petitioner*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
EASTERN DIVISION**

VAGHARSHAK SARGYSAN  
  
Petitioner,  
  
v.  
  
PAM BONDI, et al.,  
  
Respondents.

CASE NO. 5:25-cv-03341  
**DECLARATION OF KEVIN HARRIS**

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I, Kevin Harris, declare:

1. I have personal knowledge of the facts stated in this declaration and, if called as a witness, could testify truthfully to those facts.

2. I am lead counsel of record in this action. I submit this declaration pursuant to Civil L.R. 65-1(b).

3. On December 10th, 2025, I filed a habeas petition on their behalf in the Central District of California, Eastern Division.

4. VAGHARSHAK SARGYSAN was detained at the Adelanto ICE Processing Center at the time I filed the habeas petition.

5. After filing the habeas petition, my office e-mailed defendants and I informed them that I had filed a habeas corpus petition and attached the filed copy. I also let them know that a motion for a temporary restraining order would be filed soon after. My office e-mailed Respondents the TRO motion and supporting documents and let them know I would be filing them shortly. As of this filing, the government has not stipulated to a TRO.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on December 19th, 2025, in San Francisco, California.

  
Kevin Harris

Kevin Harris, Esq.  
Friedman Law Firm  
3947 Lennane Drive, Suite 150  
Sacramento, CA 95834  
*Attorney for Petitioner*

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

VAGHARSHAK SARGYAN

Petitioner,

v.

PAM BONDI, et al.,

Respondents.

CASE NO. 5:25-cv-03341

**[PROPOSED] ORDER GRANTING  
APPLICATION FOR A TEMPORARY  
RESTRANING ORDER**

**Immigration Habeas Case**

**ORDER**

Good cause having been shown and based on Petitioner's showing of likelihood of success on the merits and irreparable harm, the minimal harm to Respondents, and the public's interest in upholding the Constitution, the Court **GRANTS** Petitioner's Application for a Temporary Restraining Order.

Respondents are **ENJOINED** from:

1. detaining Petitioner unless he is provided an individualized bond hearing before an immigration judge within seven days of the date of this Order pursuant to which Respondents are required to prove by clear and convincing evidence that Petitioner is either a danger or flight risk; and
2. transferring, relocating, or removing Petitioner from the Central District of California without further order of the Court and pending final resolution of this litigation.
3. The Court **ORDERS** Respondents **TO SHOW CAUSE** as to why a preliminary injunction should not issue. Respondents shall file any response by \_\_\_\_\_, and Petitioner shall file a response no later than \_\_\_\_\_.
4. The Court **SETS** a hearing in person on whether a preliminary injunction should issue on \_\_\_\_\_, at \_\_\_\_\_. All parties are required to attend the hearing in person, and U.S. Immigration and Customs Enforcement is **DIRECTED** to transport Petitioner to the courtroom and ensure her presence at the hearing.

\_\_\_\_\_  
Date

\_\_\_\_\_  
United States District Judge