

1 Connie Chan
Connie Chan & Associates, P.C.
2 405 Sansome Street, 2nd Floor
San Francisco, CA 94111
3 Tel: 415-956-4809
Fax: 415-956-3759
4 Email: cc@connieychan.com

5 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
6 SAN FRANCISCO DIVISION

7 Qiong-Ling HE,

8 Petitioner,

9 v.

10 Todd LYONS, Acting Director,
Immigration and Customs Enforcement; Sergio
11 ALBARRAN, Field Office Director of
Enforcement and Removal Operations, San
12 Francisco Field Office, Immigration and
Customs Enforcement; Kristi NOEM,
13 Secretary, U.S. Department of Homeland
Security; U.S. DEPARTMENT OF
14 HOMELAND SECURITY; Christoper
CHESTNUT, Warden, California City
15 Correctional Facility; Minga WOFFORD,
Facility Administrator of Mesa Verde ICE
16 Processing Center; Tonya ANDREWS, Facility
Administrator of the Golden State Annex
17 Detention Facility; and Pamela BONDI, U.S.
Attorney General; EXECUTIVE OFFICE FOR
18 IMMIGRATION REVIEW,

19 Respondents.

Case No.

**EX-PARTE MOTION FOR
TEMPORARY RESTRAINING
ORDER**

PETITIONER'S DHS NUMBER:



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

NOTICE OF MOTION

1
2 Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure, Petitioner respectfully
3 moves this Court for emergency relief in the form of a temporary restraining order prohibiting
4 Respondents from re-arresting and taking Petitioner into custody absent prior notice and a pre-
5 deprivation hearing before an Immigration Judge to determine whether any renewed detention is
6 warranted based on flight risk or danger to the community.

7 Petitioner requests that the Court declare that she cannot be re-arrested unless and until
8 she is afforded a hearing on the question of whether her re-incarceration would be lawful—i.e.,
9 whether the government has demonstrated to a neutral adjudicator that she is a danger or a flight
10 risk by clear and convincing evidence.

11 Petitioner further requests that the Court enjoin Respondents from imposing any
12 additional conditions or restrictions on Petitioner, including, but not limited to, electronic
13 monitoring or home visits.

14 Petitioner also requests that the Court enjoin and restrain Respondents from re-detaining
15 Petitioner unless they obtain a travel document for her removal, and unless they follow all
16 procedures set forth in 8 C.F.R. §§ 241.4(l), 241.13(i), and any applicable statutory and
17 regulatory procedures.

18 Petitioner also seeks a temporary restraining order enjoining the Respondents from
19 transferring Petitioner outside of the Eastern District of California and the United States pending
20 final resolution of this case.

21 Petitioner further moves for the issuance of an order to show cause as to why a
22 preliminary injunction should not issue.

1 This application is supported by the Memorandum of Points and Authorities,
2 accompanying exhibits, as well as any additional submissions that may be considered by the
3 Court.

4 Undersigned counsel has contacted U.S. Attorneys Elizabeth Kurlan
5 (Elizabeth.Kurlan@usdoj.gov) and Pamela Johann (Pamela.Johann@usdoj.gov), to ascertain
6 Respondents' position regarding the TRO.

7 DATED this 12th the day of December, 2025.

/s/ Connie Chan
Attorney for Petitioner

PROOF OF SERVICE

1
2 I, the undersigned, declare that my office is in San Francisco, California. I am over the
3 age of eighteen (18) years and not a party to the action within. My business address is 405
4 Sansome Street, 2nd Floor, San Francisco, CA 94111. On December 12, 2025, I served the
5 following documents: MOTION FOR TEMPORARY RESTRAINING ORDER by placing a
6 true and correct copy in a sealed envelope, each addressed as follows:

7 Kristi Noem
8 U.S. Department of Homeland Security
9 2801 Nebraska Avenue NW
10 Washington, D.C. 20528

11 Todd M. Lyons
12 U.S. Immigration and Customs Enforcement
13 500 12th Street SW
14 Washington, DC 20536

15 Sergio Albarran
16 San Francisco Field Office
17 U.S. Immigration and Customs Enforcement
18 630 Sansome Street
19 Rm 590
20 San Francisco, CA 94111

21 Pamela Bondi
22 950 Pennsylvania Avenue, NW
23 Washington, DC 20530-0001

24 Civil Process Clerk
United States Attorney's Office for the
Northern District of California
450 Golden Gate Avenue
P.O. Box 36055
San Francisco, CA 94102

By mail. I am readily familiar with the business for collection and processing of
correspondence for mailing in the United States Postal Service and that this document, with

1 postage fully prepaid, will be deposited with the United States Postal Service this date in the
2 ordinary course of business.

3 I declare under the penalty of perjury that the foregoing is true and correct. Executed on
4 December 12, 2025, at San Francisco, California.

5 /s/ Connie Chan
6 Connie Chan
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24