

MATTHEW D. SEGAL, Bar No. 190938
matthew.segal@stoel.com
COREY M. DAY, Bar No. 311021
corey.day@stoel.com
MONICA M. BROWNER, Bar No. 329717
monica.browner@stoel.com
STOEL RIVES LLP
500 Capitol Mall, Suite 1600
Sacramento, CA 95814
Telephone: 916.447.0700
Facsimile: 916.447.4781

*Attorneys for Petitioner JENIFER NOHELIA
HERNANDEZ LOPEZ*

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

JENIFER NOHELIA HERNANDEZ LOPEZ,

Petitioner,

v.

SERGIO ALBARRAN, Field Office Director
of the San Francisco Immigration and Customs
Enforcement Office; CHRISTOPHER
CHESTNUT, Warden of the California City
Detention Facility, KRISTI NOEM, Secretary
of the United States Department of Homeland
Security; TODD LYONS, Acting Director of
United States Immigration and Customs
Enforcement; PAMELA BONDI, Attorney
General of the United States, acting in their
official capacities,

Respondents.

Case No. 25-cv-01890-DAD-SCR

**PETITIONER'S NOTICE OF MOTION
AND MOTION FOR PRELIMINARY
INJUNCTION**

Date: March 16, 2026
Time: 1:30 PM
Location: Courtroom 4, 15th Floor
Judge: Hon. Dale A. Drozd

NOTICE OF MOTION AND MOTION

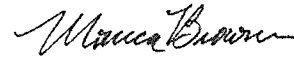
PLEASE TAKE NOTICE as soon as it may be heard in the United States District Court for the Eastern District of California, that Petitioner Jenifer Nohelia Hernandez Lopez (“Petitioner”) will and hereby does move for a preliminary injunction pursuant to Federal Rule of Civil Procedure 65(a) and Civil Local Rule 231.

On December 19, 2025, this Court issued an order granting Petitioner’s motion for temporary restraining order (ECF No. 11) ordering Petitioner’s immediate release from Respondents’ custody. For the reasons the Court set forth in the Court’s Temporary Restraining Order (ECF No. 11), Petitioner respectfully requests that this Court issue an order that Respondents are enjoined and restrained from re-detaining Petitioner for any purpose, absent exigent circumstances, without providing Petitioner notice and a pre-detention hearing before a neutral adjudicator.

This motion is based on this Notice of Motion and Motion; 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. Specifically, this motion incorporates and relies on the same facts and arguments presented in Petitioner’s Motion for Temporary Restraining Order (ECF No. 2), and adds that at time of her release, Petitioner was served with ICE Form I-220A, but she has been too afraid to present herself to the agency that just arrested her unlawfully and held her in custody for almost two weeks in a re-purposed California state prison. This motion is also supported by the Petition for Writ of Habeas Corpus (ECF No. 1).

1 DATED: December 23, 2025

STOEL RIVES LLP

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7 *Attorneys for Petitioner JENIFER NOHELIA*
8 *HERNANDEZ LOPEZ*

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