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Attorneys for Petitioner

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

E.L.D.M.,

Petitioner,

vs.

MOISES BECERRA, Field Office Director of
Enforcement and Removal Operations, San
Francisco Field Office, Immigration and Customs
Enforcement, in his official capacity; KRISTI
NOEM, Secretary of U.S. Department of
Homeland Security, in her official capacity; U.S.
DEPARTMENT OF HOMELAND SECURITY;
PAMELA BONDI, U.S. Attorney General of the
United States, in her official capacity;
EXECUTIVE OFFICE OF IMMIGRATION
REVIEW; RON MURRAY, Warden, Mesa Verde
ICE processing center, in his official capacity,

Respondents.

Case No.:

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

1 PLEASE TAKE NOTICE that Petitioner E.L.D.M. will and hereby does move the Court
2 pursuant to Federal Rule of Civil Procedure 65 and Local Rule 231 for a temporary restraining
3 order against Respondents and their agents and employees and any other persons who are in
4 active concert or participation with them.

5 The grounds for the motion are that there is a likelihood of success on the merits because
6 Respondents are violating Petitioner's statutory and procedural due process rights, Petitioner is
7 being irreparably harmed, the balance of equities tips in Petitioner's favor, and an injunction is in
8 the public interest. Petitioner does not request a hearing. Petitioner respectfully requests that the
9 Court grant a temporary restraining order ordering Petitioner's immediate release from custody
10 or, in the alternative, ordering his release unless Respondents hold a bond hearing within seven
11 days.

12 This motion is based upon the accompanying memorandum of points and authorities, the
13 Declarations of Otis Carl Landerholm and Petitioner, the simultaneously filed Verified Petition
14 for Writ of Habeas Corpus, and any further information presented to the Court. The TRO
15 Checklist is attached.

16 Dated: December 17, 2025

Respectfully submitted,
Otis Carl Landerholm
Landerholm Immigration, A.P.C.

Jonathan Weissglass
Law Office of Jonathan Weissglass

By: /s/ Otis Carl Landerholm
Otis Carl Landerholm

Attorneys for Petitioner