

SALGADO & PERALTA, P.A.
Mario Salgado, SBN: 128533
605 Market Street, Suite 1111
San Francisco, CA 94105
Tel: (415) 401-8699

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

Santos Maria Martinez-Guillen,

Petitioner,

v.

CORECIVIC, INC., a Maryland corporation,
operating the California City Detention
Facility; Kristi NOEM, Secretary of the
Department of Homeland Security; Pamela
BONDI, U.S. Attorney General; in their
official capacity; Moises BECERRA, in his
official capacity as Field Office of
Immigration and Customs Enforcement,
Enforcement and Removal Operations.

Respondents.

Case Number: _____

**PETITIONER'S NOTICE OF
EMERGENCY MOTION FOR
TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION &
MOTION FOR TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

[LOCAL RULE 231(c)(2),(d)(1)]

ORAL ARGUMENT REQUESTED

[LOCAL RULE 231(g)]

PLEASE TAKE NOTICE, Petitioner respectfully requests that the Court grant her ex parte emergency motion for a temporary restraining order and preliminary injunction to enjoin Respondents from continuing her detention in violation of statutes and the United States Constitution. [L.R. 230(b), 231(a)]. The grounds for this motion pursuant to are set forth in the writ of habeas corpus [L.R. 231(c)(1)], accompanying brief [L.R. 231(c)(3), (d)(2)(i)], affidavits demonstrating irreparable injury [L.R. 231(c)(4), (d)(2)(ii)], exhibits in support thereof, and the applicable law. A proposed order also accompanies this motion. [L.R. 231(c)(6)-(8), (d)(2)(iii)]

Date: December 17, 2025

Respectfully Submitted,
/s/ Mario Salgado
Mario Salgado, Esq.

CERTIFICATE OF SERVICE

I, Mario Salgado, am over the age of 18 years and maintain a business address located at 605 Market Street Suite 1111 in San Francisco, California 94105. I mailed the **PETITIONER'S NOTICE OF EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION & MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION [LOCAL RULE 231(c)(2),(d)(1)]** to:

1. CORECIVIC, INC. Attn: Amanda Garcia, Registered Corporate Agent
Authorized Employee, located at 330 N. Brand Blvd, Glendale, CA 94103
2. Kristi NOEM, Secretary of the Department of Homeland Security, Office
of the General Counsel; U.S. Department of Homeland Security; 245
Murray Lane, SW; Mail Stop 0485; Washington, D.C. 20258-0485.
3. Pamela BONDI, U.S. Attorney General, U.S. Department of Justice; 950
Pennsylvania Avenue, NW; Washington, D.C. 20530-0001 Civil Process
Clerk & United States Attorney's Office for the Eastern District of
California; 2500 Tulare Street, Suite 4401, Fresno, CA 93721.
4. Moises BECERRA, Field Office of Immigration and Customs
Enforcement, Enforcement and Removal Operations, Department of
Homeland Security, Office of the General Counsel; U.S. Department of
Homeland Security; 245 Murray Lane, SW; Mail Stop 0485; Washington,
D.C. 20258-0485.

I swear under penalty of perjury under the laws of the United States of America that the foregoing is true and correct:

Date: December 17, 2025

/s/ Mario Salgado
Mario Salgado, Esq.