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Attorneys for Petitioner

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

  

Petitioner,

v.

Christopher CHESTNUT, Warden of the
California City Detention Facility; Sergio
ALBARRAN, Acting Director of the San
Francisco U.S. ICE Field Office; Kristi NOEM,
Secretary, U.S. Department of Homeland
Security; Pamela BONDI, U.S. Attorney
General,

Respondents.

Case No. 1:25-cv-01912-TLN-CKD

**MOTION FOR TEMPORARY
RESTRAINING ORDER**

Petitioner moves this Court for a Temporary Restraining Order barring respondents from removing the petitioner from the Eastern District of California; prohibiting Respondents from communicating with Petitioner concerning her rights, responsibilities, or possible outcomes of any proceeding regarding her removal from the United States or these proceedings, absent the presence of counsel; and, ordering her immediate release from custody.

DATED this 22nd day of December 2025.

/s/ Neal F. Dougherty
Neal F. Dougherty
Attorney for Petitioner
Ramirez-Smith Law