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

R. M.,

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; U.S. DEPARTMENT OF
HOMELAND SECURITY; Pamela BONDI,
U.S. Attorney General; Executive Office of
Immigration Review,

Respondents.

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

**PETITIONER'S STATUS REPORT
AND REQUEST TO CONVERT
TEMPORARY RESTRAINING
ORDER TO A PRELIMINARY
INJUNCTION**

On January 6th, 2026, the Court ordered the parties to file a joint status report detailing a planned course of action within 10 days. On January 9th, Friday, 2026, at 11:04 AM, Counsel for the Petitioner sent an email seeking to meet and confer in compliance with the Court's Order with the subject line "Status Report Ordered in R.M. v. Chestnut, et al. 1:25-cv-01912-TLN-CKD" to

Opposing Counsel at the following addresses: robert.abendroth@usdoj.gov, linda.ramirez@usdoj.gov. To date, the undersigned has received no response.

Petitioner respectfully moves the Court to convert the Temporary Restraining Order into a preliminary injunction. Petitioner does not require additional briefing beyond that which was submitted in support of the Temporary Restraining Order; however, Petitioner would reserve the opportunity to reply to any response or opposition of the Respondents. As this case is not meaningfully distinct from *Franco v. Meyer*, 2025 1:25-cv-01620-DAD-CKD; 2025 WL 3280782 (2025), and there are no facts in dispute, the Petitioner does not foresee a hearing being necessary.

Respectfully submitted this 20th day of January 2026.

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