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Attorney for Petitioner

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

RICARDO CHUZON HERNA,

Petitioner

vs.

CHRISTOPHER CHESTNUT,

Warden, California City

Correctional Facility; **SERGIO**

ALBARRAN, Field Office

Director of Enforcement and

Removal Operations, San

Francisco Field Office; **TODD M.**

LYONS, Acting Director of the

United States Immigration and

Customs Enforcement; **KRISTI**

NOEM, Secretary of the United

States Department of Homeland

Security; **PAMELA JO BONDI,**

United States Attorney General, *in*

their official capacities,

Respondents

CASE NO. 1:25-at-1331

PETITIONER'S EX-PARTE

APPLICATION FOR

TEMPORARY RESTRAINING

ORDER AND ORDER TO SHOW

CAUSE

ALIEN NUMBER:



1 Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure, Petitioner hereby
2 moves the Court for emergency relief in the form of a temporary restraining order directing
3 Respondents to immediately release Petitioner from custody with no additional conditions of
4 release that were not imposed prior to his detention in 2025 or to provide Petitioner with
5 individualized hearing before a neutral decisionmaker pursuant to 8 U.S.C. § 1226(a).

6 Petitioner also seeks a temporary restraining order enjoining the Respondents from
7 transferring him outside of the District of Eastern California and the United States pending final
8 resolution of this case.

9
10 Petitioner further moves for the issuance of an order to show cause as to why a
11 preliminary injunction should not issue.

12 This application is supported by the Memorandum of Points and Authorities,
13 accompanying exhibits, as well as any additional submissions that may be considered by the
14 Court.

15 Undersigned counsel has contacted Assistant U.S. Attorneys office to ascertain
16 Respondents' position regarding the TRO.

17
18 Respectfully submitted,

19 Date: December 18, 2025

By: /s/ Arash Yasrebi
Arash Yasrebi
Attorney for Petitioner

PROOF OF SERVICE

I, the undersigned, declare that my office is in Oakland, California. I am over the age of eighteen (18) years and not a party to the action within. My business address is 1999 Harrison St 18th floor, Oakland, CA 94612. On December 18, 2025, I served the following documents:

PETITIONER'S EX-PARTE APPLICATION FOR TEMPORARY RESTRAINING

ORDER AND ORDER TO SHOW CAUSE by placing a true and correct copy in a sealed envelope, each addressed as follows:

Christopher Chestnut
California City Detention Facility
22844 Virginia Boulevard
California City, CA 93505

Sergio Albarran
San Francisco Field Office
U.S. Immigration and Customs Enforcement
630 Sansome Street
Rm 590
San Francisco, CA 94111

Todd M. Lyons
U.S. Immigration and Customs Enforcement
500 12th Street SW
Washington, DC 20536

Kristi Noem
U.S. Department of Homeland Security
2801 Nebraska Avenue NW
Washington, D.C. 20528

Pamela Jo Bondi
950 Pennsylvania Avenue NW
Washington, DC 20530-0001

Civil Process Clerk
U.S. Attorney's Office
501 I Street, Suite 10-100
Sacramento, CA 95814

By mail. I am readily familiar with the business for collection and processing of correspondence for mailing in the United States Postal Service and that this document, with postage fully prepaid, will be deposited with the United States Postal Service this date in the ordinary course of business.

I declare under the penalty of perjury that the foregoing is true and correct. Executed on December 18, 2025, at Oakland, California.

/s/ Arash Yasrebi
Arash Yasrebi