

1 Connie Chan  
2 Connie Chan & Associates, P.C.  
3 405 Sansome Street, 2nd Floor  
4 San Francisco, CA 94111  
5 Tel: 415-956-4809  
6 Fax: 415-956-3759  
7 Email: cc@connieychan.com

8 Attorney for Petitioner

9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION

12 KAIFENG WANG, ) CASE NO.  
13 )  
14 Petitioner ) PETITIONER'S EX-PARTE  
15 ) APPLICATION FOR  
16 vs. ) TEMPORARY RESTRAINING  
17 ) ORDER AND ORDER TO SHOW  
18 ) CAUSE  
19 Todd LYONS, Acting Director, )  
20 Immigration and Customs )  
21 Enforcement; Sergio ALBARRAN, )  
22 Field Office Director of ) ALIEN NUMBER   
23 Enforcement and Removal )  
24 Operations, San Francisco Field )  
25 Office, Immigration and Customs )  
Enforcement; Kristi NOEM, )  
Secretary, U.S. Department of )  
Homeland Security; U.S. )  
DEPARTMENT OF HOMELAND )  
SECURITY; Christoper )  
CHESTNUT, Warden, California )  
City Correctional Facility; Minga )  
WOFFORD, Facility Administrator )  
of Mesa Verde ICE Processing )  
Center; Tonya ANDREWS, )  
Facility Administrator of the )  
Golden State Annex Detention )  
Facility; and Pamela BONDI, U.S. )  
Attorney General; EXECUTIVE )  
OFFICE FOR IMMIGRATION )  
REVIEW,

Respondents

1 Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure, Petitioner requests that  
2 the Court declare that Respondents cannot re-arrest him unless and until he is afforded a hearing  
3 on the question of whether his re-incarceration would be lawful—i.e., whether the government  
4 has demonstrated to a neutral adjudicator that he is a danger or a flight risk by clear and  
5 convincing evidence.

6 Petitioner further requests that the Court enjoin Respondents from imposing any  
7 additional conditions or restrictions on Petitioner, including, but not limited to, electronic  
8 monitoring or home visits.

9 Petitioner also seeks a temporary restraining order enjoining the Respondents from  
10 transferring him outside of the District of Northern California and the United States pending final  
11 resolution of this case.

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

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

17 Undersigned counsel has contacted U.S. Attorneys Elizabeth Kurlan  
18 (Elizabeth.Kurlan@usdoj.gov) and Pamela Johann (Pamela.Johann@usdoj.gov), to ascertain  
19 Respondents' position regarding the TRO.  
20

21  
22 Respectfully submitted,

23 Date: December 18, 2025

24 By: /s/ Connie Chan  
25 Connie Chan  
Attorney for Petitioner

**PROOF OF SERVICE**

1  
2 I, the undersigned, declare that my office is in San Francisco, California. I am over the  
3 age of eighteen (18) years and not a party to the action within. My business address is 405  
4 Sansome Street, 2nd Floor, San Francisco, CA 94111. On December 18, 2025, I served the  
5 following documents: **PETITIONER'S EX-PARTE APPLICATION FOR TEMPORARY**  
6 **RESTRAINING ORDER AND ORDER TO SHOW CAUSE** by placing a true and correct  
7 copy in a sealed envelope, each addressed as follows:  
8

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

11 Minga Wofford  
12 Mesa Verde ICE Processing Facility  
425 Golden State Ave  
13 Bakersfield, CA 93301

14 Tonya Andrews  
15 Golden State Annex Detention Facility  
611 Frontage Rd.  
16 McFarland, CA 93250

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

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

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

