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UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

AMORNRIT CHAN SIRIPAN,

Petitioner,

v.

TONYA ANDREWS, in official capacity,
Facility Administrator of Golden State Annex;
SERGIO ALBARRAN, in official capacity,
Acting Field Office Director of ICE's San
Francisco Field Office; TODD M. LYONS, in
official capacity, Acting Director of ICE,
KRISTI NOEM, in official capacity, Secretary
of the U.S. Department of Homeland Security;
PAM BONDI, in official capacity, Attorney
General of the United States,

Respondents.

Case No. _____

**EX-PARTE NOTICE OF MOTION
FOR TEMPORARY RESTRAINING
ORDER AND PRELIMINARY
INJUNCTION**

Immigration Habeas Case

NOTICE OF MOTION

PLEASE TAKE NOTICE that, as soon as he may be heard, Petitioner will and hereby does move, pursuant to Rule 65(b) of the Federal Rules of Civil Procedure and Rule 231 of the Local Rules of this Court, for a temporary restraining order and preliminary injunction directing Respondents to release Petitioner and prohibiting Respondents from detaining him unless and until he is afforded a hearing as required by the Due Process clause of the Fifth Amendment, to determine whether his removal to Thailand is reasonably foreseeable and whether circumstances have changed such that his redetention would be justified—that is, whether he poses a danger or flight risk. Petitioner also seeks a temporary restraining order enjoining Respondents from relocating Petitioner outside of the Eastern District of California.

This application is supported by the Memorandum of Points and Authorities, the Habeas Petition, and the Declaration of Kelsey Morales with accompanying exhibits, as well as any additional submissions that may be considered by the Court.

Petitioner moves for a temporary restraining order and preliminary injunction on **Count One** of the Petition, which asserts that his detention by Respondents without a predeprivation hearing before a neutral arbiter violates his procedural due process rights; and under **Count Three** of the Petition, which asserts that the revocation of Petitioner’s order of supervision violated 8 U.S.C. § 1231(a)(6) and binding agency regulations because (i) the revocation was not issued by the proper official but rather by a local employee who failed to make the requisite findings as required by regulation; (ii) the revocation was done in the absence of regulatory authority – as there are no “changed circumstances” or other reasons (such as a violation of the conditions of release) justifying the revocation, considering the government has not procured a travel document; and (iii) Respondents failed to provide Petitioner with a “prompt” informal interview, as required. These violations independently necessitate Petitioner’s release from custody.

WHEREFORE, Petitioner prays that this Court grant his request for a temporary restraining order and a preliminary injunction directing Respondents release Petitioner and further enjoining Respondents from detaining him unless he is afforded a hearing before a

1 neutral decisionmaker on the question of whether his re-incarceration would be lawful. The only
2 mechanism to ensure that he is not continuously unlawfully detained in violation of his due
3 process rights is a temporary restraining order from this Court.

4 Respectfully submitted this 18th of December, 2025.

5 /s/ Kelsey Morales

6 Kelsey Morales

7 Attorney for Petitioner
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