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5
6 UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

7 Monica Liliana ROBLES RODRIGUEZ,

8 Petitioner,

9 v.

10 Todd M. LYONS, Acting Director,
Immigration and Customs Enforcement; Brian
11 ACUNA, Acting Field Office Director of
Enforcement and Removal Operations, New
12 Orleans; Sergio ALBARRAN, Field Office
Director of Enforcement and Removal
13 Operations, San Francisco Field Office, U.S.
Immigration and Customs Enforcement; Kristi
14 NOEM, Secretary, U.S. Department of
Homeland Security; U.S. DEPARTMENT OF
15 HOMELAND SECURITY; Pamela BONDI,
Attorney General of the United States;
16 EXECUTIVE OFFICE FOR IMMIGRATION
REVIEW; Christopher CHESTNUT, Warden,
17 California City Detention Facility,

18 Respondents.

Case No.

**EX-PARTE MOTION FOR
TEMPORARY RESTRAINING
ORDER**

PETITIONER'S DHS NUMBER:



NOTICE OF MOTION

Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure, Petitioner respectfully moves this Court for emergency relief in the form of a temporary restraining order directing Respondents to release Petitioner from custody immediately upon issuance of the Order.

Second, Petitioner requests that the Court declare that Petitioner's re-detention violates the Due Process Clause of the Fifth Amendment, the INA its implementing regulations, the APA, and the *Accardi* Doctrine.

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

Fourth, Petitioner asks the Court to enjoin and restrain Respondents from re-detaining Petitioner absent prior notice and a pre-deprivation hearing before a neutral decisionmaker to determine whether any renewed detention is warranted based on flight risk or danger to the community.

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

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

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

Undersigned counsel has contacted the United States Attorney's Office to ascertain

1 Respondents' position regarding the TRO and is awaiting their reply.

2 Respectfully submitted,

3 Date: December 24, 2025

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