

1 Andrés P. Lemons (CA SBN #325661)
2 UC Immigrant Legal Services Center
3 9500 Gilman Dr, MC0048, Student Services Center 555
4 La Jolla, CA 92093
5 Telephone: (530) 219-8856 | Email: andres.ucimm@law.ucdavis.edu
6 Pro Bono Counsel for Petitioners-Plaintiffs
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8 **UNITED STATES DISTRICT COURT**
9 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

10 Angel Alejandro QUEZADA GRADO

11 and

12 Qinchuan Liu CHAMBERS
13

14 Petitioners-Plaintiffs,

15 v.

16 Pamela Bondi, U.S. Attorney General;
17 Kristi Noem, Secretary, U.S. Dept. of
18 Homeland Security; Joseph B. Edlow,
19 Director, U.S. Citizenship and
20 Immigration Services; Todd Lyons,
21 Acting Director of Immigration and
22 Customs Enforcement; and Gregory J.
23 Archambeault, San Diego Field Office
Director for ICE ERO,

Respondents-Defendants.

Case No.: 3:25-cv-03833-JLS-MMP

PETITIONER'S *EX PARTE*
MOTION FOR TEMPORARY
RESTRAINING ORDER

Fed. R. Civ. P. 65(b); Civ.LR 7.1

1 **PETITIONER’S *EX PARTE* MOTION FOR TEMPORARY RESTRAINING**
2 **ORDER**
3

4 1. Petitioner Angel Alejandro Quezada Grado (hereinafter “Mr.
5 Quezada Grado” and/or “Petitioner”) by and through undersigned counsel, will and
6 hereby requests the issuance of an emergency Temporary Restraining Order *ex parte*
7 to restrain Respondents, their agents, officers, employees, and all persons acting in
8 concert with them from arresting, detaining, or removing Petitioner in connection
9 with his U.S. Citizenship and Immigration Services (“USCIS”) Adjustment of Status
10 (“AOS” or “Adjustment Application”) scheduled for January 6, 2026, at 8:00 a.m.
11 at the USCIS San Diego Field Office (25 Front Street, San Diego, California,
12 92101), pursuant to Rule 65(b) of the Federal Rules of Civil Procedure. This action
13 is necessary to allow Petitioner to attend his adjustment interview safely, and to
14 protect him from irreparable harm while this action remains pending. In the
15 alternative, Petitioner requests that the government be required to file a response by
16 12 pm on Monday, January 5, 2026.
17

18 In support of thereof, Petitioner states as follows:

19 2. Fed. R. Civ. P. 65 provides for the issuance of an emergency
20 temporary restraining order under circumstances such as exist in the present case, to
21 be effective up to fourteen (14) days.
22
23

1 3. In support of this *ex parte* application, Petitioner submits the
2 Affidavit of Attorney Andrés P. Lemos, filed contemporaneously, herewith, which
3 sets forth the facts under penalty of perjury. Ex. J (Attorney Emails). Petitioner
4 further submits the Memorandum of Points and Authorities in support of the Ex
5 Parte Application for Emergency Temporary Restraining Order, which addresses all
6 necessary elements for the entry of such an order.
7

8 4. On June 23, 2025, Mr. Quezada Grado and his spouse concurrently
9 filed a Form I-130, Petition for Alien Relative and a Form I-485, Application to
10 Adjust Status. Mr. Quezada Grado is fully eligible for adjustment under 8 U.S.C. §
11 1255(a). Petitioner has a mandatory interview scheduled.
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13 5. Petitioner fears imminent arrest or detention by ICE at his USCIS
14 interview for his pending adjustment of status application based on a new policy
15 adopted by USCIS. *See* EDF No. 1 (Petition for Writ of Habeas Corpus and
16 Complaint for Declaratory and Injunctive Relief (filed Dec. 30, 2025) 25-CV-3833
17 JLS (MMP)). Such enforcement would cause irreparable harm including separation
18 from family, exposure to detention and removal proceedings, and financial and
19 emotional distress to his family unit. *Id.*

20 6. On December 30, 2025, Petitioner filed a Writ of Habeas Corpus
21 and Complaint for Declaratory and Injunctive Relief. ECF No. 1. The following day,
22 on December 31, 2025, This Court issued an Order to Show Cause as to why the
23

1 Petition should not be granted by filing a response to the Petition no later than
2 January 14, 2026. ECF No. 2.

3
4 7. Petitioner's counsel attempted to avoid the need for a TRO by
5 contacting Respondents' counsel on December 31, 2025, and again in the morning
6 of January 2, 2026, to reach an agreement, namely, that Respondents will not arrest
7 Petitioner on January 6, 2026, at his adjustment of status interview. *See* Declaration
8 of Counsel, Attorney Andrés P. Lemons concurrently filed. However, despite
9 multiple requests, Respondents' counsel did not provide any assurances that
10 Respondents will not arrest Petitioner on January 6. *Id.*

11
12 8. In Petitioner's January 2, 2026, communication with Respondents'
13 counsel, Petitioner's attorney shared a near final copy of the Memorandum of Points
14 and Authorities in Support of the TRO now being filed. *Id.*

15 9. Notice has been provided to Respondents, via counsel, through
16 email, as described in the Certificate of Notice filed contemporaneously herewith.

17 10. For the foregoing reasons and for the reasons set forth in
18 Petitioner's Memorandum of Law and exhibits in support thereof, the
19 Petition/Complaint, and the applicable law, Petitioner respectfully requests that the
20 Court grant his Emergency Motion for a TRO. In the alternative, Petitioner requests
21 that the government be required to file a response by 12pm on Monday, January 5,
22 2026. A proposed order will be filed contemporaneously.
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DATED January 2, 2026.

Respectfully Submitted,

/s/Andrés P. Lemons
Andrés P. Lemons (CA SBN #325661)
UC Immigrant Legal Services Center
9500 Gilman Dr MC0048, Student Services
Center 555
La Jolla, CA 92093
Telephone: (530) 219-8856
Email: andres.ucimm@law.ucdavis.edu