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FILED
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U.S. DIST. COURT, WESTERN DIST. OKLA.
BY *AKC* , DEPUTY

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

Rasul Tagirov

Petitioner,

v.

Pamela Bondi, Attorney
General of the United States;
John Cantu, Phoenix Field
Office Director Immigration
and Customs Enforcement
and Removal Operations
("ICE/ERO"); Todd Lyons,
Acting Director of
Immigration Customs
Enforcement ("ICE") U.S.
Immigration and Customs
Enforcement; Kristi Noem,
Secretary of the Department
of Homeland Security
("DHS"); Scarlet Grant,
Warden of Cimarron
Correctional Facility; U.S.
Department of Homeland
Security,

Respondents.

Case No. CIV-26-003-JD

**Petitioner's Application for a
Temporary Restraining Order;
Points and Authorities in
Support of Motion for
Temporary Restraining Order**

As of the writing of this motion, more than 220 federal judges¹ (including numerous in this Court, *e.g.*, *Cruz-Hernandez v. Noem*, No. CIV-25-1378-D, slip op. at 4–6 (W.D. Okla. Jan. 2, 2026) have rejected the Respondents’ new draconian detention policy, and on December 18, 2025, Judge Sykes entered a Final Judgment certifying a *nationwide* class action and declaring that “the proper interpretation of the INA preserves a noncitizen’s right to an individualized bond hearing after arrest.” *Lazaro Maldonado Bautista v. Santacruz Jr.*, No. 5:25-cv- 01873. Further, on December 11, 2025, the Seventh Circuit concluded the Department of Homeland Security and the U.S. Immigration and Customs Enforcement were “not likely to succeed on the merits of their argument” regarding “mandatory detention under § 1225(b)(2)(A).” *Castanon-Nava v. U.S. Dep’t of Homeland Sec.*, No. 25-3050, 2025 WL3552514, at *9 (7th Cir. Dec. 11, 2025).

Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure, Petitioner hereby moves the Court for emergency relief in the form of a temporary restraining order directing Respondents to release Petitioner from their custody within THREE DAYS of the issuance of an Order.

This application is supported by the Memorandum of Points and Authorities.

¹ Politico, *Trump expands detention and deportation policy* (Nov. 28, 2025), <https://www.politico.com/news/2025/11/28/trump-detention-deportation-policy-00669861>.

INTRODUCTION

Petitioner's continued detention is particularly unlawful because Petitioner is a class member of *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM (C.D. Cal. Nov. 25, 2025), a nationwide class action challenging DHS's detention practices. On December 18, 2025, Judge Sykes entered a Final Judgment declaring that "the Bond Eligible Class members are detained under 8 U.S.C. § 1226(a) and are not subject to mandatory detention under § 1225(b)(2)." *Id.* at 1. To prevent the continuation of unlawful arrests and detention, the *Bautista* Court further vacated under the Administrative Procedure Act the DHS policies known as the "Interim Guidance Regarding Detention Authority for Applicants for Admission." *Id.* The vacatur confirms that DHS lacks lawful authority to subject class members such as Petitioner to mandatory detention and underscores that Petitioner's ongoing confinement, now exceeding six months, violates both statutory limits and constitutional due process.

Notwithstanding the final judgment in *Bautista*, the Immigration Judge sitting in Aurora, Colorado determined that, assuming *arguendo* jurisdiction existed, Petitioner nevertheless posed a risk of flight. *See* Ex. A. That determination, however, was made without any inquiry into whether materially changed circumstances justified a different custody outcome than the one reached when Petitioner was previously released on his own recognizance in 2017, or at

any point prior to his most recent detention. In the absence of any articulated or supported finding of changed circumstances supported by clear and convincing evidence, the Immigration Judge's custody determination cannot sustain Petitioner's continued detention. Accordingly, Petitioner seeks release from custody pursuant to an order of this Court *without* seeking a new bond redetermination hearing in the immigration court.

In the interest of expedition and in light of the ongoing irreparable harm, Petitioner hereby incorporates and respectfully refers the Court to her Verified Petition for a full statement of the facts giving rise to this motion. In sum, this case presents facts like recent cases in which courts have provided swift interim relief: ICE detained Petitioner while he was driving his car near Yuma, Arizona on or around May 2, 2025, not because he presents a danger or flight risk, but rather pursuant to a new, unlawful policy targeting people for arrest at immigration court for the purpose of re-routing them through expedited removal procedures. This re-detention violates Petitioner's due process rights and causes her irreparable, ongoing harm. The unconstitutional deprivation of "physical liberty" "unquestionably constitutes irreparable injury." *Hernandez v. Sessions*, 872 F.3d 976, 994-95 (9th Cir. 2017). Indeed, "[f]reedom from imprisonment-from government custody, detention, or other forms of physical restraint-lies at the heart of the liberty that [the Due Process] Clause protects." *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

Petitioner thus respectfully requests that this Court issue a temporary restraining order (1) prohibiting the government from transferring or removing Petitioner pending these proceedings; and (2) releasing Petitioner from custody within THREE DAYS of this Order.

ARGUMENT

To obtain a temporary restraining order, a petitioner “must establish that [s]he is likely to succeed on the merits, that [s]he is likely to suffer irreparable harm in the absence of preliminary relief,” and that the balance of equities and public interest weigh in her favor. *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 20 (2008).

A petitioner seeking a temporary restraining order must demonstrate that “all four of the equitable factors weigh it [his] favor.” *Sierra Club, Inc. v. Bostick*, 539 Fed. App’x 885, 888 (10th Cir. 2013). The likelihood-of-success and irreparable-harm factors are “the most critical” in the analysis. *People’s Trust Fed. Credit Union v. Nat’l Credit Union Admin. Bd.*, 350 F. Supp. 3d 1129, 1139 (D.N.M. 2018) (citing *Nken v. Holder*, 556 U.S. 418, 434 (2009)). Regarding the irreparable-harm factor, “[w]hen an alleged constitutional right is involved, most courts hold that no further showing of irreparable injury is necessary.”

Planned Parenthood Ass’n of Utah v. Herbert, 828 F.3d 1245, 1263 (10th Cir. 2016) (citations omitted). The balance-of-equities and public-interest factors “merge” where, like here, the government is the opposing party. *Nken*, 556 U.S. at

435.

A temporary restraining order “preserve[s] the status quo [ante]” before a final decision on the merits. *Resolution Trust Corp v. Cruce*, 972 F.2d 1195, 1198 (10th Cir. 1992). The status quo ante is “the last peaceable uncontested status existing between the parties before the dispute developed.” *Free the Nipple-Fort Collins v. City of Fort Collins, Colo.*, 916 F.3d 792, 798 n. 3 (10th Cir. 2019) (citation omitted).

I. PETITIONER IS LIKELY TO SUCCEED ON THE MERITS.

A. Petitioner's detention violates substantive due process.

The Due Process Clause applies to “all ‘persons’ within the United States, including [noncitizens], whether their presence here is lawful, unlawful, temporary, or permanent.” *Zadvydas*, 533 U.S. at 693. “The touchstone of due process is protection of the individual against arbitrary action of government,” *Wolff v. McDonnell*, 418 U.S. 539, 558 (1974), including “the exercise of power without any reasonable justification in the service of a legitimate government objective,” *Cnty. of Sacramento v. Lewis*, 523 U.S. 833, 846 (1998). “Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that Clause protects.” *Zadvydas*, 533 U.S. at 690.

To comply with substantive due process, Respondents' deprivation of an individual's liberty must be justified by a sufficient purpose. Therefore, immigration detention, which is "civil, not criminal," and "nonpunitive in purpose and effect," must be justified by either (1) dangerousness or (2) flight risk. *Zadvydas*, 533 U.S. at 690; *see Hernandez*, 872 F.3d at 994 ("[T]he government has no legitimate interest in detaining individuals who have been determined not to be a danger to the community and whose appearance at future immigration proceedings can be reasonably ensured by a lesser bond or alternative conditions."). When these rationales are absent, immigration detention serves no legitimate government purpose and becomes impermissibly punitive, violating a person's substantive due process rights. *See Jackson v. Indiana*, 406 U.S. 715, 738 (1972) (detention must have a "reasonable relation" to the government's interests in preventing flight and danger); *see also Mahdawi v. Trump*, No. 2:25-CV-389, 2025 WL 1243135, at *11 (D. Vt. Apr. 30, 2025) (ordering release from custody after finding petitioner may "succeed on his Fifth Amendment claim if he demonstrates either that the government acted with a punitive purpose or that it lacks any legitimate reason to detain him").

Petitioner here, who has no criminal record and who is diligently pursuing his immigration case, is neither a danger nor a flight risk. Therefore, his re-detention is not justified by a legitimate purpose. *See Saravia v. Sessions*, 280 F.

Supp. 3d 1168, 1176 (N.D. Cal. 2017), *aff'd sub nom. Saravia for A.H. v. Sessions*, 905 F.3d 1137 (9th Cir. 2018) ("Release reflects a determination by the government that the noncitizen is not a danger to the community or a flight risk."). Nothing has transpired since to disturb that finding.

First, because Petitioner had no criminal history since arriving in this country in 2023, with no intervening criminal history or arrests since his entry, there is no credible argument that he is a danger to the community.

Second, as to flight risk, the question is whether custody is reasonably necessary to secure a person's appearance at immigration court hearings and related check-ins. *See Hernandez*, 872 F.3d at 990-91. There is no basis to argue that Petitioner, who has previously appeared in immigration court for a master calendar hearing, is a flight risk. Moreover, Petitioner has viable paths toward immigration relief, further mitigating any risk of flight. *See Padilla v. U.S. Immigr. and Customs Enft.*, 704 F. Supp. 3d 1163, 1173 (W.D. Wash. 2023) (holding that there is not a legitimate concern of flight risk where plaintiffs have bona fide asylum claims and desire to remain in the United States). Petitioner has filed an application for asylum. He has every intention of continuing with his case and attending court. Respondents have no evidence to suggest otherwise.

In sum, Petitioner's actions since Respondents first released him confirm that he is neither a danger nor flight risk. Indeed, his ongoing compliance compels the

conclusion that he is even less of a danger or flight risk than when he was originally released. Accordingly, Petitioner's ongoing detention is unconstitutional, and due process principles require his release.

B. Petitioner's detention without the opportunity to contest his detention before a neutral decision-maker violates procedural due process.

Noncitizens living in the United States like Petitioner have a protected liberty interest in their ongoing freedom from confinement. *See Zadvydas*, 533 U.S. at 690. The Supreme Court "usually has held that the Constitution requires some kind of a hearing before the State deprives a person of liberty or property." *Zinerman v. Burch*, 494 U.S. 113, 127 (1990). This is so even in cases where that freedom is lawfully revocable. *See Hurd v. D.C., Gov't*, 864 F.3d 671, 683 (D.C. Cir. 2017) (citing *Young v. Harper*, 520 U.S. 143, 152 (1997) (holding that re-detention after pre-parole conditional supervision requires pre-deprivation hearing)); *Gagnon v. Scarpelli*, 411 U.S. 778, 782 (1973) (holding the same, in probation context); *Morrissey v. Brewer*, 408 U.S. 471, 482 (1972) (same, in parole context).

Accordingly, the Supreme Court has repeatedly held that individuals released from custody on bond, parole, or other forms of conditional release have a protected interest in their ongoing liberty, because "[t]he parolee has relied on at

least an implicit promise that parole will be revoked only if he fails to live up to the parole conditions." *Morrissey*, 408 U.S. at 482. "By whatever name, the[ir] liberty is valuable and must be seen within the protection of the [Due Process Clause]." *Id.* This liberty interest also applies to noncitizens, including those who have been conditionally released from immigration custody. *See Ortega v. Bonnar*, 415 F. Supp. 3d 963, 970 (N.D. Cal. 2019); *Garcia*, 2025 WL 1927596, at *4 (agreeing with petitioner that release on immigration bond "create[d] a powerful interest for Petitioner in his continued liberty."). Petitioner thus has a protected liberty interest in her freedom from physical custody.

Once a petitioner has established a protected liberty interest, as Petitioner has done here, courts in this circuit apply the *Mathews* test to determine what procedural protections are due. *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976). Under that test, the court weighs: (1) the private interest affected; (2) the risk of erroneous deprivation and probable value of procedural safeguards; and (3) the government's interest. *Id.*

In this case, the factors weigh heavily in favor of releasing Petitioner and prohibiting his re-detention without a custody hearing at which the government bears the burden of proof.

First, the private interest affected in this case is profound. Petitioner's interest here "is the most significant liberty interest there is—the interest in being

free from imprisonment.” *Velasco Lopez*, 978 F.3d at 851 (citing *Hamdi v. Rumsfeld*, 542 U.S. 507, 529 (2004)). “Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that [the Due Process] Clause protects.” *Zadvydas*, 533 U.S. at 690. And “[c]ase after case instructs us that in this country liberty is the norm and detention ‘is the carefully limited exception.’” *Velasco Lopez*, 978 F.3d at 851 (quoting *United States v. Salerno*, 481 U.S. 739, 755 (1987)).

Moreover, although “the liberty interest of a noncitizen detained under section 1226(a) may . . . be slightly less weighty than that of individuals facing indefinite and prolonged detention,” it is “only slightly less.” *Hernandez-Lara*, 10 F.4th at 29 (noting that “[t]he exact length of detention under section 1226(a) is impossible to predict and can be quite lengthy”). As the Second Circuit noted in *Velasco Lopez*, “[d]etention under [section] 1226(a) is frequently prolonged because it continues until all proceedings and appeals are concluded.” 978 F.3d at 852. “Absent release on bond, detention lasts through the initial removal determination proceedings (which themselves can take months or years) and all inter-agency and federal court appeals, even where an individual has prevailed and the [g]overnment appeals.” *Id.*

Finally, it is important to recognize that the deprivation of liberty that individuals detained under section 1226(a) experience is “not the result of a

criminal adjudication.” *See id.* at 851; *see also Hernandez-Lara*, 10 F.4th at 36 (“Unlike section 1226(c), section 1226(a) applies to a wide swath of noncitizens, many of whom . . . have no criminal record at all.”). This, too, heightens Petitioner’s interest in his liberty.

Second, “the risk of an erroneous deprivation [of liberty] is high” where, as here, “[the petitioner] has not received any bond or custody redetermination hearing.” *A.E. v. Andrews*, No.1:25-cv-00107, 2025 WL 1424382, at *5 (E.D. Cal. May 16, 2025) (quoting *Jimenez v. Wolf*, No.19-cv-07996-NC, 2020 WL 510347, at *3 (N.D. Cal Jan. 30, 2020)); *see also Diep v. Wofford*, No. 1 :24-cv-01238, 2025 WL 6047444, at *5 (E.D. Cal. Feb. 25, 2025). Respondents grabbed Petitioner by surprise when he driving his car, detaining him with no notice and no opportunity to contest his re-detention before a neutral arbiter. In such circumstances, when Respondents have provided no procedural safeguards, “the probable value of additional procedural safeguards, i.e., a bond hearing, is high.” *A.E.*, 2025 WL 1424382, at *5. This is especially true here, where there is no change in Petitioner’s circumstances suggesting that he now poses a flight risk or danger to the community. His re-detention instead appears to be motivated by Respondents’ arrest and removal quotas. Neither constitutes a lawful justification to re-detain a person who does not pose a flight risk or danger to the community.

Because the private interest in freedom from immigration detention is

substantial, due process also requires that in cases like this one, the government bears the burden of proving "by clear and convincing evidence that the [noncitizen] is a flight risk or danger to the community." *Singh v. Holder*, 638 F.3d 1196, 1203-04 (9th Cir. 2011); see *Martinez v. Clark*, 124 F.4th 775, 785-86 (9th Cir. 2024) (holding that government properly bore burden by clear and convincing evidence in court-ordered bond hearing); *Doe v. Becerra*, No. 2:25-CV-00647-DJC-DMC, 2025 WL 691664, at *8 (E.D. Cal. Mar. 3, 2025) (ordering pre-deprivation bond hearing in which government bears burden by clear and convincing evidence).

Third, the government's interest in detaining Petitioner without first providing notice and submitting to a custody hearing is negligible. Immigration courts routinely conduct custody hearings, which impose a "minimal" cost to the government. See *Doe*, 2025 WL 691664, at *6; A.E., 2025 WL 1424382, at *5. Petitioner has a record of compliance, and there is no reason to believe that will change between the date of his release and his custody hearing. Indeed, courts regularly hold that the government's interest in re-detention without a custody hearing is low when the petitioner "has long complied with his reporting requirements." *Diaz v. Kaiser*, No. 3:25-CV-05071, 2025 WL 1676854, at *3-*4 (N.D. Cal. June 14, 2025) (granting TRO prohibiting re-detention of noncitizen without a pre-deprivation bond hearing); *Jorge M F. v. Wilkinson*, No. 21-CV-01434-JST, 2021 WL 783561, at *3-*4 (N.D. Cal. Mar. 1, 2021) (same); *Ortega*,

415 F. Supp.3d at 970 (granting habeas petition ordering the same); *see also* *Valdez v. Joyce*, No. 25 CIV. 4627(GBD), 2025 WL 1707737, at *4-*5 (S.D.N.Y. June 18, 2025) (granting habeas petition and immediately releasing petitioner who had been detained without process, who had "voluntarily attended his scheduled immigration court proceedings" and "established ties" through his work and volunteering with the church).

In similar cases, courts have ruled that re-detaining noncitizens without a pre-deprivation hearing in which the government bears the burden of proof violates due process and have granted the emergency relief Petitioner seeks here. *See, e.g., Garcia v. Andrews*, No. 25-cv-01884-TLN, 2025 WL 1927596, at *4 (E.D. Cal. July 14, 2025) (Chief Judge Nunley ordering ICE to release recently detained individual for whom, two years prior, an immigration judge had granted bond); *Singh v. Andrews*, No. 1:25-CV-801, 2025 WL 1918679, at *10 (E.D. Cal. July 11, 2025)(granting preliminary injunction); *Ruiz Otero v. Kaiser*, No. 3:25-cv-06536, ECF 4 (E.D. Cal. Aug. 3, 2025) (ordering release for individual released from DHS custody less than two years prior to filing); *Garro Pinchi v. Noem*, No. 5:25-cv-05632, 2025 WL 1853763, at *4 (N.D. Cal. July 4, 2025), *converted to preliminary injunction* at __F. Supp. 3d __2025 WL 2084921 (N.D. Cal. July 24, 2025) (converting TRO requiring release of asylum seeker arrested at his immigration court hearing into preliminary injunction prohibiting the government from re-

detaining her without a hearing); *Singh v. Andrews*, 2025 WL 1918679, *8-10 (E.D. Cal. July 11, 2025) (granting PI under similar circumstances); *Doe*, 2025 WL 691664, at *8 (granting TRO over one month after petitioner's initial detention); *see also, e.g., Diaz*, 2025 WL 1676854, at *3-*4; *Garcia v. Bondi*, No. 3:25-CV-05070, 2025 WL 1676855, at *3 (N.D. Cal. June 14, 2025); *Jorge M. F.*, 2021 WL 783561, at *4; *Romero v. Kafaer*, No. 22-CV-02508-TSH, 2022 WL 1443250, at *4 (N.D. Cal. May 6, 2022); *Vargas v. Jennings*, No. 20-CV-5785-PJH, 2020 WL 5074312, at *4 (N.D. Cal. Aug. 23, 2020).

In short, Respondents violated Petitioner's due process rights when they detained him without notice and without a custody hearing before a neutral arbiter. Here, only an order releasing Petitioner and enjoining re-detention, would return the parties to the "last uncontested status which preceded the pending controversy." *Doe v. Noem*, __F. Supp. 3d 2025 WL 1141279, at * 9 (W.D. Wash. Apr. 17, 2025) (quoting *GoTo.com, Inc. v. Walt Disney Co.*, 202 F.3d 1199, 1210 (9th Cir. 2000)); *see also Valdez*, 2025 WL 1707737, at *4-*5 (ordering petitioner's immediate release as remedy for procedural due process violation).

II. Petitioner Will Suffer Irreparable Harm in the Absence of a TRO.

In the absence of a TRO, Petitioner will continue to be unlawfully detained by Respondents pursuant to § 1225(b)(2). Petitioner has now been detained without a bond hearing for over six months. "Freedom from imprisonment—from

government custody, detention, or other forms of physical restraint—lies at the heart of the liberty” that the Due Process Clause protects. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001). Detention constitutes “a loss of liberty that is . . . irreparable.” *Moreno Galvez v. Cuccinelli*, 492 F. Supp. 3d 1169, 1181 (W.D. Wash. 2020) (*Moreno II*), *aff’d in part, vacated in part on other grounds, remanded sub nom. Moreno Galvez v. Jaddou*, 52 F.4th 821 (9th Cir. 2022). It “is well established that the deprivation of constitutional rights unquestionably constitutes irreparable injury.” *Melendres v. Arpaio*, 695 F.3d 990, 1002 (9th Cir. 2012) (citation modified); *Warsoldier v. Woodford*, 418 F.3d 989, 1001-02 (9th Cir. 2005). *See also Hernandez v. Sessions*, 872 F.3d 976, 994-95 (9th Cir. 2017) (“Thus, it follows inexorably from our conclusion that the government’s current policies [which fail to consider financial ability to pay immigration bonds] are likely unconstitutional—and thus that members of the plaintiff class will likely be deprived of their physical liberty unconstitutionally in the absence of the injunction—that Plaintiffs have also carried their burden as to irreparable harm.”).

III. The Balance of Equities Tips in Petitioner’s Favor and a TRO is in the Public Interest.

Because the government is a party, these two factors are considered together. *Nken v. Holder*, 556 U.S. 418, 435 (2009). The Tenth Circuit held that it

is always in the public interest to prevent the violation of a party's constitutional rights. *See Verlo v. Martinez*, 820 F.3d 1113, 1127-28 (10th Cir. 2016); *see also Fish v. Kobach*, 840 F.3d 710 (10th Cir. 2016) (holding that the public interest is served by ensuring compliance with federal law). Because the policy preventing Petitioner from obtaining bond "is inconsistent with federal law, . . . the balance of hardships and public interest factors weigh in favor of a preliminary injunction." *Moreno Galvez v. Cuccinelli*, 387 F. Supp. 3d 1208, 1218 (W.D. Wash. 2019) (*Moreno I*); *see also Moreno Galvez*, 52 F.4th 821, 832 (9th Cir. 2022) (affirming in part permanent injunction issued in *Moreno II* and quoting approvingly district judge's declaration that "it is clear that neither equity nor the public's interest are furthered by allowing violations of federal law to continue"). This is because "it would not be equitable or in the public's interest to allow the [government] . . . to violate the requirements of federal law, especially when there are no adequate remedies available." *Valle del Sol Inc. v. Whiting*, 732 F.3d 1006, 1029 (9th Cir. 2013) (second alteration in original) (citation omitted). Indeed, Respondents "cannot suffer harm from an injunction that merely ends an unlawful practice." *Rodriguez v. Robbins*, 715 F.3d 1127, 1145 (9th Cir. 2013).

CONCLUSION

For the foregoing reasons, the Court should grant Petitioner's Application for a Temporary Restraining Order. Petitioner asks the Court to order

Respondents to release Petitioner from their custody within THREE DAYS of the issuance of an Order.

Dated: January 9, 2026

Respectfully submitted,

Rasul Tagirov, *pro se*
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VERIFICATION OF PETITION PURSUANT TO 28 U.S.C. § 2242

I, Rasul Tagirov, am the Petitioner in this action. I have read the foregoing Petition for Writ of Habeas Corpus and know its contents. I declare under penalty of perjury that the statements made in the Petition are true and correct to the best of my knowledge, information, and belief.

Dated: January 9, 2026



Rasul Tagirov, Petitioner
Cimarron Correctional Facility
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petition in this case should not be granted.

- (3) Declare that Petitioner's re-detention without an individualized determination violates the Due Process Clause of the Fifth Amendment;
- (4) Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner from custody within THREE days;
- (5) Issue an Order prohibiting the Respondents from transferring Petitioner from the district without the court's approval;
- (6) Grant any further relief this Court deems just and proper.

Dated: January 9, 2025



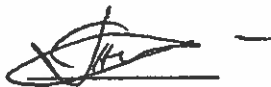
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**CERTIFICATION PURSUANT TO FEDERAL RULE OF CIVIL
PROCEDURE 65(b)(1)(B)**

Pursuant to Rule 65(b)(1)(B) of the Federal Rules of Civil Procedure, I hereby certify that on January 8, 2026, I emailed Robert J. Troester, U.S. Attorney for the Western District of Oklahoma. I provided a copy of the Application for a Temporary Restraining Order, Memorandum of Points and Authorities, to Mr. Troester by emailing copies to robert.troester@usdoj.gov.

Dated: January 9, 2026

Respectfully submitted,



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