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Attorney for Petitioner

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF CALIFORNIA

Kazem Majd

Petitioner,
v.

Christopher J. LaRose, Warden, Otay Mesa
Detention Facility
in his official capacity,
Respondent.

NOTICE OF MOTION

NOTICE OF MOTION

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT, pursuant to Local Court Rule 65(b),
Petitioner hereby requests that the Court issue a temporary restraining order
directing Respondents to release Petitioner from the Adelanto Detention Facility
and to enjoin Respondents from removing or attempting to remove Petitioner to a
third country in violation of the Constitution and statutory procedures pending the

1 resolution of the Petition for Writ of Habeas Corpus. This motion is supported by
2 the following Memorandum of Points and Authorities, and by his Petition for Writ
3 of Habeas Corpus and supporting exhibits.

4 Undersigned counsel hereby declares and certifies that on January 15, 2026
5 he emailed Erin Dimpleby - Erin.Dimpleby@usdoj.gov and Janet Cabral -
6 Janet.Cabral@usdoj.gov, Assistant United States Attorneys, with a copy of the (1)
7 Petition for Writ of Habeas Corpus; (2) Motion for Temporary Restraining Order,
8 and (3) supporting exhibits and proposed order.

9 Undersigned counsel verify that the facts set forth therein are true and
10 correct.

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13 Dated: **January 15, 2025**

Respectfully submitted,

14 /s/ Ashkan Yekrangi

15 Ashkan Yekrangi, Esq.
16 *Counsel for Petitioner*