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Counsel for Petitioner
Gurpreet Singh

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF CALIFORNIA

Gurpreet Singh 

Petitioner,
v.

Case No. '26CV0399 BJC JLB

PAMELA BONDI, in her official capacity as
Attorney General,

KRISTI NOEM, in her official capacity as
Secretary of the Department of Homeland
Security,

U.S. DEPARTMENT OF HOMELAND
SECURITY,

JEREMY CASEY, in his official capacity as
Warden of Warden of the
Imperial Regional Adult Detention Facility,

TODD M. LYONS, in his official capacity as
acting director of US Immigration and Customs
Enforcement,
Respondents.

MOTION FOR
TEMPORARY
RESTRAINING
ORDER/PRELIMINARY
INJUNCTION

1
2 Petitioner respectfully requests that the Court grant his Motion for a
3 Temporary Restraining Order and Preliminary Injunction. The grounds for this
4 motion are set forth in the accompanying memorandum of law, the Complaint, and
5 the applicable law.

6 **RESPECTFULLY SUBMITTED this Twenty Second Day of Month January,**
7 **2026**

8 /s/Jagbir Terkiana
9 Jagbir Singh Terkiana
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CERTIFICATE OF SERVICE

I, undersigned counsel, hereby certify that on this date, I filed this Motion for Temporary Restraining Order and/or Preliminary Injunction and any attachments using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

**/s/Jagbir Terkiana
Jagbir Singh Terkiana
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Dated: January 22, 2026