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Counsel for Petitioner
Gurpreet Singh

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF CALIFORNIA

Gurpreet Singh, 

Petitioner,
v.

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.

Case No. 3:26-cv-00399-

BJC-JLB

**MOTION FOR
PRELIMINARY
INJUNCTION**

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1. On January 22, 2026, Petitioner filed a petition for writ of habeas corpus together with a Motion for Temporary Restraining Order, challenging his unconstitutional detention in violation of the Due Process Clause of the Fifth Amendment.
2. On January 23, 2026, this Court issued a briefing schedule and entered a limited stay to preserve the status quo, expressly ordering that “Respondents, their agents, employees, successors, attorneys, and all persons acting in active concert or participation with them are hereby ENJOINED from removing Petitioner from the United States or from this District pending further order of the Court.”
3. Despite this Court’s order, Respondents transferred Petitioner to the Port Isabel Detention Center in Texas—outside this Court’s territorial jurisdiction—thereby violating the Court’s injunction and frustrating this Court’s ability to conduct meaningful habeas review. *See* Exhibit A
4. Respondents’ actions have caused and continue to cause irreparable harm, including unlawful deprivation of liberty, interference with Petitioner’s access to counsel, and ongoing violations of Petitioner’s statutory rights under the INA and constitutional rights under the Due Process Clause of the Fifth Amendment.

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For the foregoing reasons, Petitioner seeks a narrowly tailored preliminary injunction ordering his immediate release under reasonable conditions during the pendency of this Court’s review. This request does not seek a final adjudication on the merits; rather, it seeks to prevent ongoing and irreparable constitutional injury and to restore the status quo ante while the Court completes the show-cause and briefing process.

RESPECTFULLY SUBMITTED this Twenty Ninth Day of Month January, 2026

/s/Jagbir Terkiana
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
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Dated: January 29, 2026