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7 Attorney for Petitioner

8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA

10  
11 PARDEEP SHARMA  
12 aka PARDEEP SINGH

13 *Petitioner,*

Case No.: 3:26-cv-00513-JLS-SBC

14 v.

15 JEREMY CASEY, Warden, Imperial  
16 Regional Detention Facility; DANIEL A.  
17 BRIGHTMAN, Field Office Director,  
18 San Diego Field Office, U.S. Immigration  
19 and Customs Enforcement; TODD M.  
20 LYONS, Acting Director, U.S.  
21 Immigration and Customs Enforcement;  
22 KRISTI NOEM, Secretary of the U.S.  
23 Department of Homeland Security; and  
24 PAMELA JO BONDI, Attorney General  
25 of the United States *in their official*  
26 *capacities*

27 *Respondents.*

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**NOTICE OF MOTION & MOTION  
FOR TEMPORARY  
RESTRAINING ORDER**



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## MOTION FOR TEMPORARY RESTRAINING ORDER

Petitioner respectfully moves for a Temporary Restraining Order requiring his immediate release from immigration detention under his prior Form I-220A Order of Release on Recognizance conditions pending resolution of his habeas petition. Immediate relief is necessary because Petitioner's continued detention constitutes an ongoing violation of the Due Process Clause that this Court has already partially remedied once through habeas relief, and because Petitioner faces imminent and irreparable harm due to an impending asylum individual (final) hearing scheduled for February 3, 2026, in which detention severely impairs his ability to prepare, present testimony, and consult with counsel.

Petitioner previously prevailed on a habeas petition in this Court resulting in a court-ordered individualized bond hearing. On January 23, 2026, the immigration court denied bond following a constitutionally deficient proceeding that did not cure the violations underlying Petitioner's detention. Petitioner has now been re-detained without a warrant and has been housed at Imperial Regional Detention Facility since November 11, 2025, notwithstanding a lack of criminal history, prior release on Form I-220A Order of Release on Recognizance, full compliance with supervision, and multiple pending applications for immigration relief that strongly incentivize continued appearance.

1 Petitioner seeks this Temporary Restraining Order to preserve the status quo ante  
2 litem — specifically, his prior lawful release on I-220A — until the Court can adjudicate  
3 his habeas petition on the merits or issue a preliminary injunction maintaining his release.  
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6 **REQUESTED RELIEF**

7 Petitioner respectfully requests that the Court:

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1. ORDER Petitioner's immediate release from immigration detention under the supervision conditions previously authorized by Form I-220A Order of Release on Recognizance;
  2. ENJOIN Respondents from re-arresting or re-detaining Petitioner absent further order of this Court;
  3. ISSUE an Order to Show Cause directing Respondents to show cause why a preliminary injunction should not issue maintaining Petitioner's release during the pendency of this case;
  4. SET an expedited briefing schedule and hearing pursuant to Rule 65(b)(3); and
  5. WAIVE Rule 65(c) security in light of the nature of the relief and the fact that Respondents are government agencies.

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1 DATED this 27th of January, 2026  
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4 s/ Martin O'Hara, Esq.

5 Martin O'Hara, Esq.

6 *Counsel for Petitioner*

7 CA State Bar No. 313973

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