



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

Jaime Flores-Balderaz

Petitioner,

V.

'26CV1424 AGS DEB

**INJUNCTIVE RELIEF
TEMPORARY RESTRAINING ORDER**

Pamela Bondi, U.S. Attorney General,
Kristi Noem, Secretary of DHS,
Todd Lyons, Director of ICE,
Christopher LaRose, Warden of Otay Mesa Detention Center

Respondent's

**MOTION FOR TEMPORARY RESTRAINING ORDER,
AND
INJUNCTIVE RELIEF**

TEMPORARY RESTRAINING ORDER

Petitioner-Plaintiff Jaime Flores-Balderaz moves this court *ex parte* for a Temporary Restraining Order that would, among other things, require his immediate release from his ongoing detention by agents of Immigration and Customs Enforcement (ICE) and prohibit his re-arrest without pre-detention hearing before an "IJ" Immigration judge at which ICE establishes by clear and convincing evidence that his detention is necessary to prevent hi FlightRisk or Protect the Public.

Background:

The evidence before this Court establishes that Jaime Flores-Balderaz is a 27- year-old from Mexico who came into the United States in year 1999 by his parents at age 3. Petitioner studied through out grade School up until the 11th grade due to Petitioner dropping out of School for need of helping his family with rent money and other expenses. Petitioner has been arrested on Misdemeanor charges but were ultimately dismissed. On or about year 2023 Petitioner was accused of Domestic Violence but was dismissed because the accuser lied to the Police Department and never showed up to Court. Petitioner was also a victim of Domestic Violence by the same person and through that Petitioner ended up with the "FULL" custody of his (TWO) children which one of his Son's suffers of Autism. Petitioner is a professional Auto Body worker that works for Paul's Auto Body Shop and has a readily job if released from detention. Petitioner worked hard to provide for his Two children. Petitioner ultimately has ZERO Criminal History here in the United States and or in any part of the World. Petitioner request that this Court grant the Temporary Restraining Order so Respondent's cannot transfer Petitioner out of the Jurisdiction of the Court or from the Otay Mesa Detention Center until the Habeas Corpus is

adjudicated. My health has worsen because I have developed Depression, Anxiety, and Major Stress Disorder because of the prolonged period of detention I have spent in custody and not being able to be by the side of my children who need me now more than ever. I have not receieved any incident reports for misbehavior since I have been detained here at Otay Mesa Detention Center and have remained in good behavior while in ICE custody. I am requesting for this Temporary Restraining Order to be put in place so ICE won't be able to transfer me or deport me before this Habeas Corpus is adjudicated.

CITING CASES LAW: *Jose Anotonio Ambrocio Garcia Case No. 25-cv-03319-BAS-DEB (2025). cARMEN aRACELY pABLO sEQUEN Case No. 25-cv-06487-PCP, and F.T.C v. Dean Foods and many other cases that are being gathered.*

Date: 2/24/2026

Jaime Flores-Balderaz

[Redacted Signature]

Otay Mesa Detention Center
P.O. Box 439049
San Diego, CA 92143

Sincerely,

[Redacted Signature]