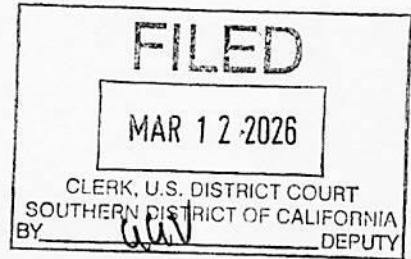


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA



Manouk Baghdasaryan

Petitioner,

V.

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

'26CV1576 JES MSB

Respondent's

MOTION FOR TEMPORARY RESTRAINING ORDER,  
AND  
INJUNCTIVE RELIEF

**TEMPORARY RESTRAINING ORDER**

Petitioner-Plaintiff, Manouk Baghdasaryan 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 his Flight Risk or Protect the Public.

**Background:**

The evidence before this Court establishes that Manouk Baghdasaryan is a 56-year-old from Armenia. Petitioner arrived from Armenia into the United States seeking Asylum on 4-9-2004. Petitioner worked as a Public Transportation for 18 years and the last 11 years as a Lyft driver. Petitioner was charged for a Domestic Violence in 2014, but the charges were dismissed. Petitioner has family in the United States who is his U.S.C. daughter of age 20. Petitioner was most recently arrested by Military Police after Petitioner taking 3 Marines to the Pendleton Marine Base as his job Lyft driver. Petitioner suffers of pain in his back due to a past car accident which caused for Petitioner's T-12 broken and also has (TWO) Metal Ribs. Petitioner was out under an Order of Supervision for the past 22 Years which Petitioner always followed and obeyed. Petitioner has no other type of Criminal Convictions or arrest that amount to classifying Petitioner as a Danger to the community or a Flight Risk since Petitioner do not have any Failure to Appear, Absconding, or Fleeing from the Law. Here it is unequivocally clear that Respondent's have a interest against Petitioner in having him under detention and Ultimately Deported. Petitioner's Due Process is unequivocally being violated and deserves to be released

under this Habeas Corpus. 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 immediate family. I have not receieved any incidenreports 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: 3/4/2026

Manouk Baghdasaryan



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

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