

1 Adem A. Balikci, Esq., SBN: 318030  
2 Tanner N. Puryear, Esq., SBN: 320826  
3 FIHER LAW FIRM, P.C.  
4 2525 Natomas Park Drive, Suite 140  
5 Sacramento, California 95833  
6 Telephone: (415) 463-7938  
7 Direct Line: (415) 694-0023  
8 Facsimile: (415) 226-7339

9 [aabalikci@fiherlf.com](mailto:aabalikci@fiherlf.com)

10 Attorneys for Petitioner,  
11 UMUT ISLAM ULGEN

12  
13 **IN THE UNITED STATES DISTRICT COURT**  
14 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

15 UMUT ISLAM ULGEN,

16 Petitioner,

17 v.

18 WARDEN OF IMPERIAL REGIONAL  
19 DETENTION FACILITY,

20 GREGORY J. ARCHAMBEAULT, Director of San  
21 Diego Field Office, Enforcement and Removal  
22 Operations, U.S. Immigration and Customs  
23 Enforcement,

24 KRISTI NOEM, Secretary of the Department of  
25 Homeland Security,

26 TODD M. LYONS, Senior Official Performing the  
27 Duties of Director of Immigration and Customs  
28 Enforcement; and

PAM BONDI, Attorney General of the United  
States,

Respondents, acting in their official capacity

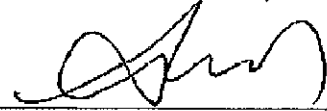
**CASE NO: 3:26-CV-01678-DMS-AHG**

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

1 Petitioner Umut Islam Ulgen (“Mr. Ulgen” or “Petitioner”) hereby respectfully moves the Court  
2 for an emergency Temporary Restraining Order (“TRO”) enjoining Respondents from detaining  
3 Petitioner for the purposes of civil immigration detention. Petitioner further moves for an order  
4 enjoining Respondents from removing, transferring, or otherwise altering Petitioner’s custodial  
5 status should he remain detained pending adjudication of his Petition for Writ of Habeas Corpus.  
6 In support of the motion, Petitioner files his Memorandum of Points and Authorities concurrently  
7 herewith, in addition to his already filed Petition for Writ of Habeas Corpus and Declaration in  
8 support thereof.

9  
10 Dated: 03/17/2026

FISHER LAW FIRM, P.C.



ADEM A. BALIKCI  
TANNER N. PURYEAR  
Attorneys for Petitioner  
UMUT ISLAM ULGEN