


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

TINGTING HUANG (A  :

Case No: '26CV2152 AGS DDL

PETITIONER, :

v. :

JOHN DOE, in his official capacity as  
Warden of the Otay Mesa Detention  
Center :

PETITIONER'S EMERGENCY  
MOTION FOR TEMPORARY  
RESTRAINING ORDER AND ORDER  
TO SHOW CAUSE RE PRELIMINARY  
INJUNCTION

TODD ARCHAMBEAULT, in his official  
capacity as Field Office Director of the  
San Diego Field Office of U.S.  
Immigration and Customs Enforcement,  
Enforcement and Removal Operations :

TODD LYONS, in his official capacity as  
Acting Director and Senior Official  
Performing the Duties of the Director of U.S.  
Immigration and Customs Enforcement :

PAMELA BONDI, in her official capacity as  
Attorney General :

RESPONDENTS. :

I, Tingting Huang, respectfully ask this Court to issue a Temporary Restraining Order under Rule 65 of the Federal Rules of Civil Procedure to preserve the status quo while my habeas petition under 28 U.S.C. § 2241 is pending.

I ask this Court to order Respondents not to remove me from the United States and not to transfer me outside the Southern District of California until the Court has had a fair opportunity to decide my habeas petition.


MEMORANDUM OF POINTS AND AUTHORITIES

I am presently detained by ICE at Otay Mesa Detention Center in San Diego, California. My habeas petition states that I have been in immigration custody since April 16, 2025. It also

states that on December 29, 2025, the Immigration Judge denied bond because the court said it lacked jurisdiction to hold a bond hearing. My petition asks this Court to order my release or, alternatively, to order a bond hearing at which the government must prove my continued detention is necessary.

I seek emergency temporary relief because, without it, Respondents may remove me or transfer me before this Court can rule on my habeas petition. If that happens, I may lose meaningful judicial review of my detention challenge.

### I. FACTS

I am detained at Otay Mesa Detention Center, 7488 Calzada de la Fuente, San Diego, California 92154. My A-number is . I have been in immigration custody since April 16, 2025. I challenged my detention in immigration court, but on December 29, 2025, bond was denied because the immigration court said it lacked jurisdiction for a bond hearing.

My habeas petition explains that I have been detained for almost a year, that I was separated from my husband, Kai Lin, when we were both detained, and that I have become depressed and isolated because of my detention. The petition also states that I am not a danger or a flight risk and that my sister, Dan Huang, is a United States citizen willing to sponsor me.

My petition further states that I have a pending BIA appeal from my removal proceedings.

### II. LEGAL STANDARD

A temporary restraining order may issue where the moving party shows likely success on the merits, likely irreparable harm without relief, that the balance of equities tips in the movant's favor, and that an injunction is in the public interest. *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 20 (2008). The Ninth Circuit also permits preliminary relief where

there are serious questions going to the merits and the balance of hardships tips sharply in the movant's favor, so long as irreparable harm and public interest are also shown. *Alliance for the Wild Rockies v. Cottrell*, 632 F.3d 1127, 1131-35 (9th Cir. 2011).

In immigration detention cases, the Ninth Circuit has recognized that due process requires significant procedural protections when detention becomes prolonged, including a bond hearing at which the government bears the burden in the appropriate circumstances. *Singh v. Holder*, 638 F.3d 1196 (9th Cir. 2011).

### III. ARGUMENT

#### **A. I raise serious questions, and likely a substantial claim, that my prolonged detention violates due process.**

My habeas petition challenges my continued detention after nearly a year in custody without a meaningful bond hearing. The immigration court did not deny bond after weighing whether I was dangerous or a flight risk. Instead, the court stated that it lacked jurisdiction to hold a bond hearing.

That means I have been detained for a prolonged period without an individualized custody determination on the merits. At minimum, this raises serious questions under the Fifth Amendment. My requested relief in the habeas petition is either immediate release or a bond hearing at which the government must prove by clear and convincing evidence that my detention is necessary.

#### **B. I will suffer irreparable harm without immediate relief.**

Continued detention is an ongoing loss of liberty. My petition also explains that detention has caused me depression, isolation, and prolonged separation from my husband. Those injuries are serious and cannot be fully repaired later.

There is also a risk of irreparable procedural harm if I am transferred or removed before the Court rules. My petition states that I have a removal order dated January 30, 2026 and that I have appealed to the BIA. If I am removed or transferred before this Court can act, meaningful review of my detention challenge may be undermined.

**C. The balance of equities favors temporary relief.**

I am not asking this Court to decide the entire habeas petition immediately. I am asking only for a narrow, temporary order preserving the status quo until the Court can review my petition. That is a limited burden on Respondents.

By contrast, if I am removed or transferred first, I may lose the benefit of meaningful review and continue to suffer detention-related harm without the Court ever reaching the merits.

**D. The public interest supports preserving judicial review and protecting due process.**

The public has a strong interest in ensuring that detention complies with the Constitution and that federal courts can decide habeas petitions in an orderly and meaningful way. A short temporary restraining order serves that interest.

**IV. REQUEST FOR RELIEF**

I respectfully ask the Court to order that:

1. Respondents shall not remove me from the United States pending further order of this Court;
2. Respondents shall not transfer me outside the Southern District of California pending further order of this Court, unless this Court grants permission;
3. Respondents shall respond to my habeas petition and this motion on an expedited schedule set by the Court; and

4. The Court grant any further relief it deems just and proper, including setting this matter for prompt review.

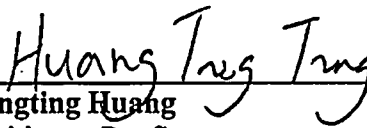

#### V. CONCLUSION

For these reasons, I respectfully ask the Court to grant this Emergency Motion for Temporary Restraining Order.

Dated:

4/2/26

Respectfully submitted,

  
Tingting Huang  
Petitioner Pro Se  
A#   
Otay Mesa Detention Center  
7488 Calzada de la Fuente  
San Diego, CA 92154