

1 Frances Arroyo
2 Los Angeles Legal Advocates
3 1025 W 190th St
4 Suite 400
5 Gardena, CA 90248

6 Natalie Renee Shepherd
7 Of Counsel
8 (805) 907-5309
9 NatalieReneeShepherd@gmail.com

10 *Attorneys for Petitioner*

11 UNITED STATES DISTRICT COURT
12 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

13 DOUGLAS NELSON HERRERA GUILLEN

14 Petitioner,

15 vs.

16 JEREMY CASEY, WARDEN OF IMPERIAL
REGIONAL ADULT DETENTION FACILITY;

17 DAVID MARIN, DIRECTOR OF LOS
18 ANGELES FIELD OFFICE, U.S.
19 IMMIGRATION AND CUSTOMS
ENFORCEMENT;

20 KRISTI NOEM, SECRETARY OF THE U.S.
21 DEPARTMENT OF HOMELAND SECURITY;
22 AND

23 PAM BONDI, ATTORNEY GENERAL OF
THE UNITED STATES,

24 IN THEIR OFFICIAL CAPACITIES,

25 Respondents

NOTICE OF SUBMISSION OF PENDING
EMERGENCY TRO REQUEST
FOLLOWING TRANSFER, AND REQUEST
FOR BRIEFING SCHEDULE

Case No. 3:26-cv-2509

**NOTICE OF SUBMISSION OF PENDING EMERGENCY TRO REQUEST
FOLLOWING TRANSFER, AND REQUEST FOR BRIEFING SCHEDULE**

Petitioner Douglas Nelson Herrera Guillen, by and through undersigned counsel, respectfully files this Notice to advise the Court that this transferred matter includes a previously filed Ex Parte Application for Temporary Restraining Order, and to respectfully request that the Court set an expedited briefing schedule, deem the TRO application submitted on the existing papers, or otherwise provide direction regarding the pending TRO request.

1. This action was originally filed in the United States District Court for the Central District of California. Petitioner filed his Petition for Writ of Habeas Corpus on March 31, 2026, and thereafter filed his Ex Parte Application for Temporary Restraining Order on April 8, 2026. The Central District transferred the matter to this District on April 14, 2026, and the case was received in this District on April 15, 2026.

2. Since transfer, Respondents have filed a Response to Petition on May 4, 2026, and Petitioner filed his Traverse / Reply in Support of Petition on May 5, 2026. Petitioner appreciates that the habeas petition is now fully briefed in that respect. The previously filed TRO application, however, has not been adjudicated or otherwise addressed following transfer.

3. Because Petitioner remains in immigration detention and continues to suffer the ongoing deprivation of liberty associated with allegedly unlawful custody, emergency relief remains necessary. Petitioner respectfully files this Notice to ensure that the transferred TRO request remains squarely before the Court.

4. Petitioner therefore respectfully requests that the Court either:

- (1) deem the previously filed TRO application submitted in this District and set an expedited briefing schedule on that request;
- (2) deem the TRO application fully submitted on the existing papers and issue any ruling the Court deems appropriate; or
- (3) provide any direction the Court deems appropriate as to whether Petitioner should re-notice, refile, or otherwise supplement the TRO papers following transfer.

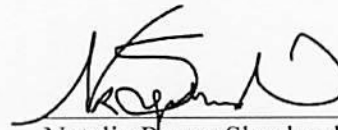
1 5. Petitioner submits this Notice solely to preserve the emergency posture of the
2 case and to ensure that the transferred TRO request is not overlooked procedurally. Petitioner
3 remains available to promptly file any supplemental papers the Court may require.
4

5 DATED: May 20, 2026

6 Respectfully Submitted,

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9 Frances Arroyo #276747
10 Los Angeles Legal Advocates
11 farroyo@lalegaladvocates.com
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