



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

Miguel Ulloa-Perez

Petitioner,

v.

**INJUNCTIVE RELIEF
TEMPORARY RESTRAINING ORDER**

Todd Blanche, U.S. Attorney General,
Markwayne Mullun, Secretary of DHS,
Todd Lyons, Director of ICE,
Christopher LaRose, Warden of Otay Mesa Detention Center
Respondent's

'26CV2562 TWR DDL

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

TEMPORARY RESTRAINING ORDER

Petitioner-Plaintiff, Miguel Ulloa-Perez 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 convincing evidence that his detention is necessary to prevent his flight risk or protect the public.

Background :

The evidence before this court establishes that Miguel Ulloa-Perez is a 43-year old from Mexico. Petitioner came into the United States illegally for a better life and future. Petitioner lived in Arizona for approximately 4 years and worked in a restaurant to pay for his living expenses. Petitioner lives with his father who is a Lawful Permanent Resident. While living in Arizona Petitioner remained in best of behavior and away from Law Enforcement. Then on 2013 Petitioner suffered his first DUI and again on 2014,2019,2020, and 2023. but as ordered by the courts Petitioner finished his Recycle Life Program and paid all fines imposed to him by the courts and Judges. Here in California Petitioner has dedicated his life to work either as an Agriculture Laborer, Construction, Restaurants, and Plumbing. Petitioner suffers of High Cholesterol and here in this facility Petitioner is not receiving the appropriate medication treatment. This facility is being Sued by the San Diego County Health Department for medical neglect to the detainees. Petitioner while in detention has dedicated his time to change and has completed several courses and his behavior,conduct and thinking. The courses are Victims Impact program and Creative Thinking. Allow me to point out that Petitioner has also been a Victim of a crime here the San Diego County. The crime was Assault with a Deadly Weapon C.P.C 245 (A) (1) which has been

recognized by the San Diego Police Department to case [REDACTED]

[REDACTED] All this took place when Petitioner was just trying to make a living by selling Corn in cart to support himself and family. Petitioner came into the United States on 7-13-2003. 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 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 detention I have spent in custody and not being able to be by my immediate family. I have not received any incident reports for misbehavior since I have been detained here at Otay Mesa Detention Center and have been 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. It's clear that ICE violated Petitioner's Due Process Right to 14th Amendment of the U.S. Constitution by arresting him without a warrant.

CITING CASE LAW: Jose Antonio Ambrocio Garcia case No. 25-cv-03319 (2025)
Carmen Araceli Pablo Sequen Case No. 25-cv-06487
and F.T.C. v. Dean Foods and many more other cases that are
being gathered.

Date: 4-13-2026

[REDACTED]
Miguel Ulloa-Perez

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