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**JOSE JORDAN AND ASSOCIATES, APLC**

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*Attorneys for Petitioner*

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

**Odilon CASTRO CASTILLO,** )  
)  
Petitioner, )  
)  
v. )  
)  
Markwayne MULLIN, Secretary, )  
Department of Homeland Security; Todd )  
BLANCHE, Attorney General; )  
EXECUTIVE OFFICE FOR )  
IMMIGRATION REVIEW; Todd LYONS, )  
Executive Associate Director of )  
Immigration and Customs Enforcement, )  
Enforcement and Removal Operations )  
(ICE-ERO); and Jeremy CASEY, Imperial )  
Regional Detention Facility Administrator, )  
ICE-ERO, )  
)  
Respondents. )  
)

Civil Case No.: \_\_\_\_\_

**PETITIONER'S EX PARTE  
APPLICATION FOR  
COMPLAINT FOR  
TEMPORARY  
RESTRAINING ORDER  
AND ORDER TO SHOW  
CAUSE**

Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure, Odilon  
CASTRO CASTILLO (hereinafter, "Petitioner"), through his attorney of record,

1  
2 Jose R. Jordan, Esq. (hereinafter, "Present Counsel"), hereby moves the Court for  
3 emergency relief in the form of a temporary restraining order directing  
4 Respondents to release him from their custody or to provide him with an  
5 individualized bond hearing before an immigration judge pursuant to 8 U.S.C. §  
6 1226(a) within seven (7) days of issuance of an Order.  
7

8  
9 Petitioner also seeks a temporary restraining order enjoining Respondents  
10 from relocating him outside of the Southern District of California pending final  
11 resolution of this case.  
12

13 Petitioner further moves for the issuance of an order to show cause as to why  
14 a preliminary injunction should not issue.  
15

16 This application is supported by the Memorandum of Points and Authorities,  
17 accompanying exhibits, as well as any additional submissions that may be  
18 considered by the Court.  
19

20 Respondents have not indicated whether they will oppose this TRO  
21 application.  
22

23 //

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1  
2 Dated: May 18, 2026

3 Respectfully submitted,

4 /s/Jose R. Jordan, Esq.

5 JOSE JORDAN AND ASSOCIATES, APLC

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1  
2 **CERTIFICATE OF COUNSEL**

3 Pursuant to Rule 65(b)(1)(B) of the Federal Rules of Civil Procedure, L.R.  
4 7-19.1, and L.R. 65-1, I hereby certify that on May 12 and May 14, 2026, I  
5  
6 communicated with Glen F. Dorgan, Assistant U.S. Attorney, Chief, Civil Division,  
7 Southern District of California to inquire into whether Respondents would oppose  
8  
9 a TRO. More specifically, I provided Mr. Dorgan with a copy of the Application  
10 for *ex parte* Temporary Restraining Order, Memorandum of Points and Authorities,  
11 and Petition for Writ of *Habeas Corpus* to Mr. Dorgan by emailing copies thereof  
12  
13 to Glen.Dorgan@usdoj.gov shortly after filing the pleadings via CM/ECF.

14 Dated: May 18, 2026

15  
16 Respectfully submitted,

17 /s/Jose R. Jordan, Esq.

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