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Attorney for Petitioner

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION**

Lovedeep Singh

Petitioner,

v.

Orestes CRUZ,
Field Office Director, San Francisco
Immigration and Customs Enforcement
Office;

Christopher CHESTNUT,
Warden, California City Corrections Center;

Markwayne MULLIN,
Secretary of the U.S. Department of
Homeland Security;

Todd BLANCHE,
Attorney General of the United States, acting
in their official capacities;

Respondents

Case No.

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

Pursuant to Federal Rule of Civil Procedure 65(b)(1), Petitioner seeks emergency relief in form of a temporary restraining order. Specifically, Petitioner requests an order directing Respondents to either (1) immediately release Petitioner from immigration custody under the same conditions that applied prior to his July 01, 2026 detention, or (2) promptly provide Petitioner with an individualized bond hearing before an immigration judge pursuant to 8 U.S.C. § 1226(a).

Petitioner also seeks a temporary restraining order prohibiting Respondents from transferring Petitioner outside the Eastern District of California while this habeas action is pending. Transfer would interfere with the Court's jurisdiction, disrupt Petitioner's access to counsel, and risk mooted the relief requested. Since this District is the district of confinement and habeas jurisdiction attaches to the immediate custodian, preservation of the status quo is necessary to ensure the Court's ability to provide effective relief.

Petitioner further requests the issuance of an order to show cause why a preliminary injunction should not issue.

This application is supported by the accompanying Memorandum of Points and Authorities, supporting exhibits, and any additional materials the Court deems appropriate.

Counsel has contacted the United States Attorney's Office for the Eastern District of California at usacae.ecf2241@usdoj.gov, cheri.buxbaum@usdoj.gov, lynn.trinka.ernce@usdoj.gov, usacae.ecf2241@usdoj.gov regarding this request and awaits Respondents' position.

Dated: July 2, 2026

Respectfully Submitted,

/s/ Kuldip S. Dhariwal

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