

SALGADO & PERALTA, P.A.
Mario Salgado, SBN: 128533
605 Market Street, Suite 1111
San Francisco, CA 94105
Tel: (415) 401-8699

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

Jenny Fabiola Barbecho Morocho,

Petitioner,

v.

Christopher CHESTNUT in his official
capacity as the Warden of the California City
Detention Center operated by CORECIVIC,
INC., a Maryland corporation; Markwayne
MULLIN, Secretary of the Department of
Homeland Security; Todd BLANCHE, U.S.
Attorney General; in their official capacity;
Moises BECERRA, in his official capacity as
Field Office Director of Immigration and
Customs Enforcement, Enforcement and
Removal Operations.

Respondents.

Case Number: _____

**PETITIONER'S NOTICE OF
EMERGENCY MOTION FOR
TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION &
MOTION FOR TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

[LOCAL RULE 231(c)(2),(d)(1)]

ORAL ARGUMENT REQUESTED

[LOCAL RULE 231(g)]

PLEASE TAKE NOTICE, Petitioner respectfully requests that the Court grant her ex parte emergency motion for a temporary restraining order and preliminary injunction to enjoin Respondents from continuing her detention in violation of statutes and the United States Constitution. [L.R. 230(b), 231(a)]. The grounds for this motion pursuant to are set forth in the writ of habeas corpus [L.R. 231(c)(1)], accompanying brief [L.R. 231(c)(3),(d)(2)(i)], declaration demonstrating irreparable injury [L.R. 231(c)(4), (d)(2)(ii)], exhibits in support thereof, and the applicable law. A proposed order also accompanies this motion. [L.R. 231(c)(6)-(8), (d)(2)(iii)]

Date: July 7, 2026

Respectfully Submitted,
/s/ Mario Salgado
Mario Salgado, Esq.

CERTIFICATE OF SERVICE

I, Mario Salgado, am over the age of 18 years and maintain a business address located at 605 Market Street Suite 1111 in San Francisco, California 94105. I electronically served the **PETITIONER'S NOTICE OF EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION & MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION [LOCAL RULE 231(c)(2),(d)(1)]** to the United States Attorney's Office for the Eastern District of California; 2500 Tulare Street, Suite 4401, Fresno, CA 93721 via the court's filing system.

I swear under penalty of perjury under the laws of the United States of America that the foregoing is true and correct:

Date: July 7, 2026

/s/ Mario Salgado
Mario Salgado, Esq.

SALGADO & PERALTA, P.A.
Mario Salgado, SBN: 128533
605 Market Street, Suite 1111
San Francisco, CA 94105
Tel: (415) 401-8699

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

Jenny Fabiola Barbecho Morocho,

Petitioner,

v.

Christopher CHESTNUT in his official
capacity as the Warden of the California City
Detention Center operated by CORECIVIC,
INC., a Maryland corporation; Markwayne
MULLIN, Secretary of the Department of
Homeland Security; Todd BLANCHE, U.S.
Attorney General; in their official capacity;
Moises BECERRA, in his official capacity as
Field Office Director of Immigration and
Customs Enforcement, Enforcement and
Removal Operations.

Respondents.

Case Number: _____

**[PROPOSED] ORDER GRANTING
PETITIONER'S EMERGENCY
MOTION FOR TEMPORARY
RESTRAINING ORDER**

[Local Rule 231(c)(6)-(8)]

THIS MATTER comes before the Court on Petitioner's Emergency Motion for a
Temporary Restraining Order and Preliminary Injunction. Having considered the motion, the
memorandum and exhibits in support thereof, and any subsequent submissions related to the
motion, the writ of habeas corpus, and the applicable law, the Court ORDERS as follows:

1. Petitioner's motion for a temporary restraining order is GRANTED.
2. Respondents, and all of their officers, agents, and persons acting in concert of
participation with them, are hereby ENJOINED from continuing Petitioner's
detention and MUST release her from custody.

3. Respondents are ENJOINED from removing Petitioner from this Court's jurisdiction pending the outcome of proceedings.
4. \$_____/ No security bond is required under Federal Rule of Civil Procedure 65(c).
5. The parties shall, within _____ days of this Order, propose a briefing schedule with respect to Petitioner's motion for preliminary injunctive relief. The hearing date shall be heard for a motion for preliminary injunction on _____ at _____ a.m./p.m.
6. If this request was made ex parte, Respondents have the right to apply to the Court for modification or dissolution on two (2) days notice or such shorter notice as the court may allow

It is so ORDERED.

Dated this _____ day of _____, 2026 at _____ a.m./p.m.

United States District Judge

CERTIFICATE OF SERVICE

I, Mario Salgado, am over the age of 18 years and maintain a business address located at 605 Market Street Suite 1111 in San Francisco, California 94105. I electronically served the **[PROPOSED] ORDER GRANTING PETITIONER'S EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER** to the United States Attorney's Office for the Eastern District of California; 2500 Tulare Street, Suite 4401, Fresno, CA 93721 via the court's filing system.

I swear under penalty of perjury under the laws of the United States of America that the foregoing is true and correct:

Date: July 7, 2026

/s/ Mario Salgado
Mario Salgado, Esq.