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Attorney for Petitioner

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

GHEZAE FISSIHA ARONE,
Petitioner,

v.

Warden, GOLDEN STATE ANNEX,
operated by THE GEO GROUP, INC., a
Florida profit corporation; ORESTES
CRUZ, Acting Director San Francisco
Field Office, Immigration and Customs
Enforcement; MARCOS CHARLES,
Executive Associate Director Of ICE
Enforcement And Removal Operations
(ERO); Markwayne MULLIN, Secretary,
Department Of Homeland Security; and
TODD BLANCHE, Acting Attorney
General,

Respondents.

Case No. _____

**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 his ex parte emergency motion for a temporary restraining order and preliminary injunction to enjoin Respondents from continuing his 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)], affidavits demonstrating irreparable injury [L.R. 231(c)(4), (d)(2)(ii)], exhibits in support thereof, and the applicable law.

1 A proposed order also accompanies this motion. [L.R. 231(c)(6)-(8), (d)(2)(iii)]

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3 Respectfully submitted,

4 /s/ Chien-Yu Michael Wang

Dated: July 9, 2026

5 Chien-Yu Michael Wang

6 WILNER & O'REILLY, APLC

7 Attorney for Petitioner, Ghezze Fissiha ARONE