Connie Chan
Connie Chan & Associates, P.C.
405 Sansome Street, 2nd Floor
San Francisco, CA 94111
Tel: 415-956-4809
Fax: 415-956-3759
Email: info@connieychan.com
Attorney for Petitioner

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

YANLING XIE,

Petitioner,

v.

SERGIO ALBARRAN, Field Office Director of the San Francisco Immigration and Customs Enforcement Office; DAVID VENTURELLA, Acting Director of United States Immigration and Customs Enforcement; MARKWAYNE MULLIN, Secretary of the United States Department of Homeland Security; TODD BLANCHE, Acting 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

ALIEN NUMBER: A [redacted]

Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure, Petitioner requests that the Court order Respondents to release Petitioner from custody if they carry out her imminent re-detention during her scheduled ICE check-in on July 22, 2026, at 2:00 p.m.

Respondents are ENJOINED and RESTRAINED from re-detaining Petitioner unless and until they obtain a travel document for her removal, and unless and until they follow all procedures set forth in 8 C.F.R. §§ 241.4(l), 241.13(i), and any other applicable statutory and regulatory procedures.

Petitioner also requests that the Court enjoin Respondents from imposing additional conditions or restrictions on Petitioner, including, but not limited to, electronic monitoring or home visits. Petitioner also seeks a temporary restraining order enjoining the Respondents from transferring Petitioner outside the Northern District of California or removing her from the United States pending final resolution of this case. Petitioner further moves for the issuance of an order to show cause as to why a preliminary injunction should not issue.

Petitioner also requests that the Court stay her removal from the United States, and enjoin Respondents from executing her removal, unless and until the immigration court adjudicates her pending motion to reopen and motion for stay of removal, and for a reasonable period thereafter sufficient to permit any administrative appeal and judicial review.

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

Undersigned counsel has contacted the United States Attorney's Office for the Northern District of California to ascertain Respondents' position regarding the TRO.

Respectfully submitted,

Date: July 22, 2026

/s/ Connie Chan
Connie Chan
Connie Chan & Associates, P.C.
405 Sansome Street, 2nd Floor
San Francisco, CA 94111
Tel: 415-956-4809
Fax: 415-956-3759
Email: info@connieychan.com
Attorney for Petitioner