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15 **UNITED STATES DISTRICT COURT**

16 **NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

17 Carmen Aracely PABLO SEQUEN, Yulisa
18 ALVARADO AMBROCIO, Martin
HERNANDEZ TORRES, and Ligia GARCIA,

19 Plaintiffs-Petitioners,

20 v.

21 SERGIO ALBARRAN, MARCOS
22 CHARLES, THOMAS GILES, MONICA
BURKE, KRISTI NOEM, U.S.
23 DEPARTMENT OF HOMELAND
SECURITY, TODD M. LYONS, SIRCE E.
24 OWEN, PAMELA BONDI, U.S.
IMMIGRATION AND CUSTOMS
25 ENFORCEMENT, UNITED STATES
DEPARTMENT OF JUSTICE, EXECUTIVE
26 OFFICE FOR IMMIGRATION AND
REVIEW, UNITED STATES OF AMERICA,

27 Defendants-Respondents.
28

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Case No. 5:25-cv-06487-PCP

**PLAINTIFFS-PETITIONERS' NOTICE
OF MOTION FOR TEMPORARY
RESTRAINING ORDER AND MOTION
FOR TEMPORARY RESTRAINING
ORDER**

Case No. 5:25-cv-06487-PCP

NOTICE OF MOTION FOR TEMPORARY RESTRAINING ORDER AND MOTION

PLEASE TAKE NOTICE as soon as it may be heard in the United States District Court for Northern District of California, that Petitioners-Plaintiffs Ligia Garcia ("Ms. Garcia") and Yulisa Alvarado Ambrocio ("Ms. Alvarado Ambrocio") will and hereby do move for a temporary restraining order pursuant to Federal Rule of Civil Procedure 65(b). Because Ms. Garcia's current detention and Ms. Alvarado Ambrocio's imminent arrest does and would violate the Due Process Clause of the Fifth Amendment to the United States, Movants respectfully request that this Court (1) order Ms. Garcia's immediate release from Defendants-Respondents' ("Respondents") custody pending these proceedings, without requiring bond or electronic monitoring, absent a pre-deprivation hearing on at least ten days' notice before the San Francisco Immigration Court, where Respondents shall bear the burden of proof to show, by clear and convincing evidence, that she is a danger or a flight risk; and (2) enjoin Respondents from re-detaining Ms. Alvarado Ambrocio, absent a pre-deprivation hearing on at least ten days' notice before the San Francisco Immigration Court, where Respondents shall bear the burden of proof to show, by clear and convincing evidence, that she is a danger or a flight risk. To preserve this Court's jurisdiction and ensure effective relief through prompt compliance with this Court's orders, Movants further seek an order (3) enjoining Respondents from transferring Petitioners out of this District or deporting them during the pendency of the underlying case. This motion is based on this Notice of Motion and Motion; the accompanying Memorandum of Points and Authorities; the Amended Class Complaint and Petition filed in this case; the Proposed Order; the papers, evidence, and records on file in this action; and any other written or oral evidence or argument as may be presented at or before the time this motion is heard by the Court. Consistent with Civil L.R. 65-1, Movants seek relief at the earliest possible opportunity. Pursuant to Civil L.R. 65-1(a)(5), and as described in the supporting Declaration of Jordan Wells, Counsel for Movants notified Counsel for Respondents of this forthcoming Motion and advised that they would seek the aforementioned relief.

1 DATED: September 18, 2025

LAWYERS' COMMITTEE FOR CIVIL RIGHTS OF
THE SAN FRANCISCO BAY AREA

2 By:

/s/ Jordan Wells

JORDAN WELLS

VICTORIA PETTY

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NISHA KASHYAP

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