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7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**

9 Ruben BENITEZ;
10 Eliezer BERNAL MENDIOLA;
11 Veliz Armando BRAVO CHILEL;
12 Marco Eliseo CHAMORRO ARANGO;
13 Alpiria CHAVEZ MARTINEZ;
14 Angela FAVIAN ANGEL;
15 Hans HERNANDEZ PEREZ;
16 Mario ROMERO DE LA CRUZ; and
17 Jose VALERO LAGUNAS,

Petitioners,

14 v.

15 Kristi NOEM, Secretary, U.S.
16 Department of Homeland Security;
17 Pamela BONDI, U.S. Attorney General;
18 Todd LYONS, Acting Director,
19 Immigration and Customs Enforcement;
20 Ernesto SANTACRUZ JR., Acting
21 Director, Los Angeles Field Office,
22 Immigration and Customs Enforcement,
23 Enforcement and Removal Operations;
24 Fereti SEMAIA, Warden, Adelanto ICE
25 Processing Center; IMMIGRATION
26 AND CUSTOMS ENFORCEMENT;
27 DEPARTMENT OF HOMELAND
28 SECURITY,

Respondents.

Case No. 5:25-cv-2190

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

1 Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure, Petitioners
2 hereby move the Court for emergency relief in the form of a temporary restraining
3 order directing Respondents to release Petitioners from their custody or to provide
4 Petitioners with individualized bond hearings before an immigration judge pursuant
5 to 8 U.S.C. § 1226(a) within seven days of issuance of an Order.

6 Petitioners also seek a temporary restraining order enjoining the Respondents
7 from relocating Petitioners outside of the Central District of California pending
8 final resolution of this case.

9 Petitioners further move for the issuance of an order to show cause as to why
10 a preliminary injunction should not issue.

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

14 As described in the Certificate of Counsel below, Respondents oppose this
15 TRO Application and respectfully ask that they be allowed to file an opposition to
16 the TRO application by close of business on Friday, August 22, 2025.

17
18 Dated: August 21, 2025

Respectfully submitted,

19 s/ Niels W. Frenzen
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28 Attorneys for Petitioners

CERTIFICATE OF COUNSEL

Pursuant to Rule 65(b)(1)(B) of the Federal Rules of Civil Procedure and L.R. 65-1, I hereby certify that on August 20, 2025 at 2:00 PM, I spoke by telephone with Daniel Beck, Chief, Complex and Defensive Litigation Section, U.S. Attorney's Office, Central District of California. Prior to our conversation I emailed Mr. Beck a summary of the parties and claims. Mr. Beck stated that Respondents opposed a TRO and asked that I represent to the Court that Respondents would like to file an opposition to the TRO application by close of business on Friday, August 22, 2025.

I have provided a copy of the Application for a Temporary Restraining Order, Memorandum of Points and Authorities, Supporting Exhibits, and Petition for Writ of Habeas Corpus to Mr. Beck by emailing copies to Daniel.Beck@usdoj.gov at approximately 11:15 AM on August 21, 2025.

Dated: August 21, 2025

Respectfully submitted,

s/ Niels W. Frenzen
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