

BERNARD P. WOLFSDORF
Wolfsdorf Rosenthal, LLP
1416 2nd Street, Santa Monica, CA 90401
(310) 570-4088 bernard@wolfsdorf.com

BRAD BANIAS
Banias Law, LLC
602 Rutledge Avenue, Charleston, SC 29403
843.352.4272 brad@baniaslaw.com
pro hac vice forthcoming

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

Reza Eric Nouri,	)	C/A No.: 8:25-cv-1905-JHW-DTB
	)	
Petitioner,	)	
	)	
v.	)	
	)	
Jennifer Herrera, Assistant Field Office Director,	)	
Orange County Detained Program, Los Angeles	)	
Field Office of U.S. Immigration and Customs	)	
Enforcement;	)	
	)	
Respondent.	)	

**SUPPLEMENTAL EVIDENCE IN SUPPORT OF PETITIONER'S APPLICATION FOR
A TEMPORARY RESTRAINING ORDER OR IN THE ALTERNATIVE PRELIMINARY
INJUNCTION**

Petitioner now provides the attached Declaration to supplement his Application for a Temporary Restraining Order. Nouri Declaration (attached as Ex. A). Since filing the Application yesterday, Respondent has moved the Petitioner from Santa Ana to the U.S. Bureau of Prisons Metropolitan Detention Center Los Angeles at 535 N. Alameda Street, Los Angeles, California 90012. *Id.* at ¶ 2. Further, Respondent served Petitioner with a Form I-294, Warning to Alien Ordered Removed or Deported. *Id.* at ¶ 3. Petitioner requested an opportunity to discuss the form

1 with his attorney—undersigned counsel—before signing it, and Respondent refused him access
2 before forcing him to place his thumb print on the form. *Id.* Making matters worse, Respondent
3 refused to provide him a copy of the Form I-294. *Id.* This is an unsettling development as ICE’s
4 Detention and Removal Operations Policy and Procedure Manual indicates Forms I-294 are
5 served at the same time as Forms I-205, Warrant of Removal, which would indicate that ICE is
6 now prepared to remove Petitioner to Iran or a third-country, though Respondent has identified
7 no third country that has agreed to accept Mr. Nouri and Respondent has not had a chance to
8 contest that location for removal. Detention and Removal Operations Policy and Procedure
9 Manual at 22.¹ Petitioner also reports that he is forced to sleep on a concrete floor at the
10 Metropolitan Detention Center, which amounts to unconstitutional punishment. *See Doe v. Kelly*,
11 878 F.3d 710, 721 (9th Cir. 2017).

14 This new evidence tends to support Petitioner’s claim to irreparable harm because it
15 appears Respondent is prepared to remove Petitioner to Iran or a third-country. If Respondent
16 removes him to Iran, it would violate his previous grant of relief under the Convention Against
17 Torture and put his life and liberty at significant risk. If Respondent removes him to a third-
18 country, Petitioner would be at risk from Iran’s actions to threaten, intimidate, and attack
19 political and religious dissidents in third countries. The supplement further supports irreparable
20 harm that Respondent is refusing to give Petitioner access to his counsel. Finally, this evidence
21 demonstrates continued violation of 8 C.F.R. § 241.13(i)(2)-(3) because Respondent has still not
22 provided Petitioner his procedural rights to challenge the notice of revocation. 8 C.F.R. §
23 241.13(i)(3).

27 ¹ Available at
28 https://www.ice.gov/doclib/foia/dro_policy_memos/09684drofieldpolicymanual.pdf (last visited
Aug. 28, 2025).

1 For these reasons and those in the original application, this Court should grant
2 Petitioner's request for a restraining order, enjoining the effect of the notice of revocation of
3 release and restraining his continued detention.
4

5 August 28, 2025

Respectfully submitted,

6 s/Bernard P. Wolfsdorf
7 BERNARD P. WOLFSDORF
8 CA Bar No. 107657
9 Wolfsdorf Rosenthal, LLP
10 1416 2nd Street
11 Santa Monica, CA 90401
12 (310) 570-4088
13 bernard@wolfsdorf.com

14 s/Brad Banias
15 BRAD BANIAS
16 Banias Law, LLC
17 602 Rutledge Avenue
18 Charleston, SC 29403
19 843.352.4272
20 brad@baniaslaw.com

21 *pro hac vice pending*

22 Attorneys for Plaintiff
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