

1
2 UNITED STATES DISTRICT COURT
3 WESTERN DISTRICT OF WASHINGTON
4 AT SEATTLE

5 KENETH MENA TORRES

6 Petitioner,

7 v.

8 CAMILA H. WAMSLEY, Seattle Interim Field
9 Office Director, Enforcement and Removal
10 Operations, United States Immigration and
11 Customs Enforcement (ICE); BRUCE SCOTT,
12 Warden, Northwest ICE Processing Center;
13 KRISTI NOEM, Secretary of Homeland
14 Security; UNITED STATES DEPARTMENT
15 OF HOMELAND SECURITY (DHS);
16 PAMELA BONDI, Attorney General of the
17 United States; EXECUTIVE OFFICE FOR
18 IMMIGRATION REVIEW (EOIR); SIRCE
19 OWEN, Acting Director EOIR; TACOMA
20 IMMIGRATION Court, in their official
21 capacities

22 Respondents

No.

**EX PARTE APPLICATION FOR TEMPORARY
RESTRAINING ORDER AND MOTION FOR
PRELIMINARY INJUNCTION**

Agency No.

A 

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TABLE OF AUTHORITIES

Cases

Matter of Q. Li 29 I&N Dec. 66 (BIA 2025)

Matter of Garcia Garcia 25 I&N Dec. 93 (BIA 2009)

Trump v. International Refugee Assistance Project, 582 U.S. 571, 579 (2017)

Hernandez v. Sessions, 872 F.3d 976, 999 (9th Cir. 2017)

Leiva-Perez v. Holder, 640 F.3d 962, 964 (9th Cir. 2011)

Nken v. Holder, 129 S. Ct. 1749, 1762 (2009)

Winter v. Natural Resources Def. Council, Inc., 555 U.S. 7, 20 (2008)

Golden Gate Rest. Ass'n v. City & Cty. of San Francisco, 512 F.3d 1112, 1126 (9th Cir. 2008)

Gutierrez-Chavez v. INS, 298 F.3d 824, 829 (9th Cir. 2002)

Statutes

8 U.S.C. § 1158(b)(3)(B)

8 U.S.C. § 1158(b)(3)(C)

8 U.S.C. § 1182(d)(5)(A)

8 U.S.C. § 1225(b)(1)

8 U.S.C. § 1225(b)(2)

8 U.S.C. § 1226(a)

8 U.S.C. § 1232

Regulations

8 CFR § 208.21

8 C.F.R. § 212.5

INTRODUCTION AND STATEMENT OF FACTS

1. Petitioner Keneth Mena Torres (Mr. Mena Torres) has filed a petition for habeas corpus to prevent his continued unlawful detention.

2. Mr. Mena Torres' petition challenges the legal and constitutional errors of the Immigration Judge.

3. Mr. Mena Torres also moves the Court to enter a preliminary injunction during the pendency of this petition.

4. Mr. Mena Torres is a 20-year-old young man from Honduras. He is a full-time Kitchen Manager at Super Duper Burger in Emeryville, California. He is also a student in the Alameda County Community College District studying English and auto mechanics.

5. Mr. Mena Torres first entered the United States in or around August 16, 2016 at the age of approximately eleven. Upon his arrival to the United States, the Department of Homeland Security, (DHS) designated him an Unaccompanied Child (UAC). As required under the Trafficking Victims Protection Reauthorization Act of 2008 (TVRPA), Mr. Mena Torres was transferred to the custody of the Office of Refugee Resettlement (ORR) where he remained in custody until he could be reunified with a proper sponsor. See also 8 U.S.C. § 1232.

6. Mr. Mena Torres filed an I-589 application for asylum on May 19, 2017 (Receipt No. Z [REDACTED]). Per the TVRPA, as a UAC, US Citizenship and Immigration Services (USCIS) has initial jurisdiction over his asylum claim. The San Francisco Immigration Court administratively closed removal proceedings against Mr. Mena Torres on June 13, 2017, ostensibly to allow for USCIS to adjudicate the asylum application.

7. The San Francisco Immigration Court granted Mr. Mena Torres' mother asylum on October 30, 2019. His mother timely filed a Form I-730 Petition for Refugee/Asylee Relative for Petitioner with USCIS on January 27, 2020 (Receipt No. I [REDACTED]). See 8 CFR § 208.21 (providing for the conferral of asylee status to the spouses and unmarried children under 21-years of

1 age of those granted asylum); INA § 208(b)(3)(B), 8 U.S.C. § 1158(b)(3)(B) (“freezing” the age of the
2 child as of the date the parent’s initial I-589 asylum application is pending.) The approval of this
3 petition would result in Petitioner obtaining asylee status and mandate termination of his removal
4 proceeding and Petitioner’s release from custody. The I-730 filed on Petitioner’s behalf remains
5 pending before USCIS as of today’s date. A mandamus action related to the I-730 was filed in the
6 Northern District Court of California San Francisco Division on August 22, 2025 (3:25-cv-07137).

7 8. On August 12, 2025, in Oakland, California, Mr. Mena Torres was swept up along with
8 several housemates and neighbors during execution of a search warrant targeting two other residents
9 of the plot of land he lived on, which includes his home and a separate studio unit. He was transferred
10 to the Northwest ICE Processing Center in Tacoma, Washington. On August 25, 2025, the Tacoma
11 Immigration Court found it did not have jurisdiction to redetermine his custody status, adopting an
12 extremist interpretation of the Immigration and Nationality Act that renders noncitizens who entered
13 without inspection and those who were placed in removal proceedings before an Immigration Judge
14 following an entry on immigration parole ineligible for release from custody and ineligible to seek
15 review of their custody determination by a neutral arbiter (i.e. an Immigration Judge). The
16 Immigration Court found in the alternative that if it did have jurisdiction, it would find Mr. Mena
17 Torres was not dangerous, as he has no criminal history, and that he merited a \$5,000 bond.
18

19 ISSUES PRESENTED

- 20 (1) Whether Petitioner’s mandatory detention without the opportunity for review by a neutral
21 arbiter would probably result in irreparable injury.
- 22 (2) Whether Petitioner has made a strong showing of likely success on the merits where the
23 Immigration Court erred in finding a lack of jurisdiction to hear the Petitioner’s request for a
24 redetermination of his custody despite the statutes in question being interpreted to provide
25 jurisdiction for over 30 years.
26

(3) Whether the public interest supports evaluation of flight risk and dangerousness of a civil detainee by a neutral arbiter, and release from custody where that arbiter finds the Petitioner not dangerous and suitable for release separate from the jurisdictional issue.

CERTIFICATON OF NOTICE

FRCP 65B(1)(a)

9. An *ex parte* TRO requires a certification from the movant's counsel regarding efforts to notify the opposing party of the application. Petitioner's counsel, Nicole Gamble, certifies that she has made efforts to advise Respondents of the request for a TRO by:

- 1) On September 5, 2025, emailing and telephoning Assistant U.S. Attorney Michelle R. Lambert, of the Tacoma office, at (253) 428-3824 and michelle.lambert@usdoj.gov,
- 2) emailing the address identified on this case's docket as associated with "U.S. Attorney Habeas" at usawaw.habeas.usdoj.gov,
- 3) emailing all Assistant U.S. Attorneys associated with the Habeas Petition as listed on the Order issued on 9/5/25: Assistant U.S. Attorneys John Price at John.Price2@usdoj.gov; Katherine Reed-Johnson at Katherine.Reed-Johnson@usdoj.gov; Michael Morgan at Michael.Morgan4@usdoj.gov; Stephanie Huerta-Ramirez at Stephanie.Huerta-Ramirez@usdoj.gov; Paul Albert Kidd at Paul.Albert.Kidd@usdoj.gov

The communications each stated that she was the attorney for an immigration detainee held in mandatory detention without neutral arbiter review, because the Tacoma Immigration Court found it lacked jurisdiction. But that the Immigration Court found a lack of dangerousness and flight risk and that an appropriate bond would have been \$5,000.

ARGUMENT

LEGAL STANDARDS FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

10. The Court may enter a TRO and preliminary injunction pursuant to FRCP 65. A TRO without notice to the opposing party may be issued if based on a verified complaint showing that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition. FRCP 65(b)(1)(A).

11. The standard for deciding requests for a temporary restraining order or preliminary injunctive relief are the same. A party seeking a preliminary injunction must demonstrate that (1) it is likely to suffer irreparable harm absent injunctive relief; (2) it is likely to succeed on the merits; (3) the

1 balance of the equities tips in its favor; and (4) the public's interest weighs in favor of granting the
2 injunction. *Nken v. Holder*, 129 S. Ct. 1749, 1762 (2009); *Winter v. Natural Resources Def. Council,*
3 *Inc.*, 555 U.S. 7, 20 (2008). In the related context of stays of removal¹, the Supreme Court has held
4 that a noncitizen must demonstrate injury above and beyond removal itself. *Id.* Further, the Court
5 must consider the governmental and public interest in a prompt execution of removal orders. *Id.* The
6 Court must also consider any circumstance suggesting that the need for prompt execution of the order
7 is heightened, such as in the case of a particularly dangerous alien or one who has abused the
8 processes provided to him. *Id.* A court cannot assume that the balance of hardships will weigh heavily
9 in favor of the alien but must give individualized consideration to the above factors under the
10 circumstances of each case. *Id.*

11
12 12. A party applying for preliminary injunctive relief must show that irreparable injury is
13 more likely than not, and not merely a possibility. *Id.* But, within the Ninth Circuit, once a party has
14 made the minimum permissible showing of irreparable harm, the Court must weigh and balance the
15 other stay factors using a "sliding scale" or "continuum" approach. *Leiva-Perez v. Holder*, 640 F.3d
16 962, 964 (9th Cir. 2011). "Crafting a preliminary injunction is an exercise of discretion and judgment,
17 often dependent as much on the equities of a given case as the substance of the legal issues it
18 presents." *Trump v. International Refugee Assistance Project*, 582 U.S. 571, 579 (2017). "The
19 purpose of such interim equitable relief is not to conclusively determine the rights of the parties ... but
20 to balance the equities as the litigation moves forward." *Id.* (citation omitted).

21
22 **PETITIONER DEMONSTRATES THE PROBABILITY OF IRREPARABLE INJURY**

23 13. Respondents have detained Mr. Mena Torres for almost one month without the
24 opportunity to demonstrate his lack of dangerousness, low risk of flight, or to otherwise guarantee his
25

26 ¹ Petitioner does not seek a stay of removal, for he is not yet subject to any such order. But both
27 Supreme Court and Ninth Circuit precedent on stays of removal have developed the precedent generally
28 applicable to preliminary injunctive relief.

1 appearance at future Immigration Court and DHS appointments. During that time, he has lost the
2 opportunity to work, to go to school, and to spend time with his family. “[U]nlawful detention
3 certainly constitutes extreme or very serious damage, and that damage is not compensable in
4 damages.” *Hernandez v. Sessions*, 872 F.3d 976, 999 (9th Cir. 2017).

5 14. Mr. Mena Torres is a 20-year-old young man who is being prevented from bettering his
6 future, as he is losing the opportunity to continue his education right at the beginning of the school
7 year. Losing the opportunity to continue with his schooling will cause him irreparable injury as he will
8 always be behind in his education. This loss causes ripple effects in the rest of his life, as he will not
9 be able to improve his economic circumstances without bettering his education. This detention will
10 cause him irreparable harm in that it is condemning him to a life where he is always fighting to catch
11 up. Even if Mr. Mena Torres prevails in his judicial challenge to the Immigration Court’s detention
12 decision, these injuries are of the type that cannot later be effectively remedied by a court order or
13 award of a sum of money.
14

15 15. “In addition to the potential hardships facing Plaintiffs in the absence of the injunction,
16 the court[s] may consider ... the indirect hardship to their friends and family members.” *Hernandez v.*
17 *Sessions*, 872 F.3d 976, 996 (9th Cir. 2017) (citing *Golden Gate Rest. Ass’n v. City & Cty. of San*
18 *Francisco*, 512 F.3d 1112, 1126 (9th Cir. 2008)). Mr. Mena Torres resided with his mother, Ms.
19 Norma Torres Avila, at the home where he was arrested. He provides his mother with significant
20 emotional support after the untimely death of her husband and his father, in approximately 2018. As
21 an economic contributor to their household, his absence has obvious financial implications.

22 16. Ms. Torres Avila is the petitioner on his I-730, a lawful permanent resident and an asylee.
23 The Refugee Act, much as in the rest of the Immigration and Nationality Act, family unity plays a
24 primary and outsized-role in policy. The I-730, as compared to the I-130, allows for a direct change of
25 status to asylum. USCIS may grant an I-730 to a noncitizen who is in a pending removal proceeding,
26 who has a final order of removal, and even to one potentially subject to reinstatement of removal. All
27

1 of this is to say that while most mothers miss their children after a period of separation, the special
2 dispensation given to asylees with regard to family unity suggests an understanding of the psychology
3 of persecution and of interdependence.

4 **PETITIONER IS LIKELY TO PREVAIL IN HIS PETITION**

5 **The Court Has Jurisdiction**

6 17. Mr. Mena Torres makes a strong showing of likely success because Respondents violated
7 the law and the tenants of statutory interpretation in reaching the decision that they did not have
8 jurisdiction to hear his request for a custody redetermination and in finding that his release from ORR
9 custody was akin to the parole as contemplated by *Matter of Q. Li* 29 I&N Dec. 66 (BIA 2025). Mr.
10 Mena Torres makes a strong showing that the balance of hardships tip sharply in his favor.

11 18. A district court retains its traditional habeas jurisdiction and is not barred from addressing
12 a petition challenging the statutory framework that permits a noncitizen's detention without bail. *Singh*
13 *v. Holder*, 638 F.3d 1196 (9th Cir., 2011) (citing *Demore v. Kim*, 123 S.Ct. 1708 (2001)). Although
14 the Attorney General's "discretionary judgment ... shall not be subject to review. . . claims that the
15 discretionary process itself was constitutionally flawed are cognizable in federal court on habeas
16 because they fit comfortably within the scope of 28 U.S.C. § 2241." *Id.* (quoting *Gutierrez-Chavez v.*
17 *INS*, 298 F.3d 824, 829 (9th Cir. 2002)).

18 19. Respondents have wide discretion within the law to decide which removable noncitizens
19 to detain pending removal. But they have no authority to refuse to properly apply the Immigration and
20 Nationality Act during a detention decision. They have no authority to exercise their detention
21 discretion on the basis of an adjudicatory proceeding that denied Petitioner procedural due process and
22 violated years of the agency's past practices.

23 24. The Court is not asked to substitute its own judgement for that of Respondents—for it has
24 no authority to do so. Rather, Mr. Mena Torres asks that the Court compel them to exercise their own
25 judgment within the confines of the laws enacted by Congress and the Constitution.
26
27

21. The relief sought is a setting aside of the Immigration Court's decision on jurisdiction and a granting of its alternative finding providing for the release of Mr. Mena Torres after a payment of a \$5,000 bond.

**First Cause of Action
Violation of 8 U.S.C. §1226(a)
Detention Under 8 U.S.C. § 1225(b)(2)
Exceeds Statutory Authority**

22. Respondents argue that the mandatory detention provision at 8 U.S.C. § 1225(b)(2) applies to all noncitizens residing in the United States who have been arrested in the interior of the United States, because they are applicants for admission as defined in 8 U.S.C. § 1225(b)(1)-(2). This interpretation defies the Immigration and Nationality Act (INA) and the tenants of statutory interpretation. The plain text of the INA demonstrates that 8 U.S.C. §1226(a) applies to individuals like Mr. Mena Torres.

23. The text of § 1226 also explicitly applies to people charged as being inadmissible, including those who entered without inspection. See 8 U.S.C. § 1226(c)(1)(E). Subparagraph (E)'s reference to such people makes clear that, by default, such people are afforded a bond hearing under subsection (a). Section 1226 therefore leaves no doubt that it applies to people who face charges of being inadmissible to the United States, including those who are present without admission or parole. The Immigration Court has jurisdiction to review the custody of those detained under 8 U.S.C. § 1226(a). See *Matter of Garcia Garcia* 25 I&N Dec. 93 (BIA 2009).

24. The Immigration Court improperly relied on *Matter of Q. Li* to bolster its finding of a lack of jurisdiction. First, that case does not contemplate the special situation of UACs who require special protections under the TVPRA. Second, the case specifically refers to adults who were previously placed in expedited removal as defined in 8 U.S.C. § 1225(b)(1), released pursuant to humanitarian parole as defined in 8 C.F.R. § 212.5.

25. A UAC is expressly, statutorily prohibited from being processed under expedited removal. 8 U.S.C. § 1232. The document he is provided upon his release from ORR custody does not

1 constitute a formal parole under 8 C.F.R. § 212.5, as the document contains no mention of that
2 regulation. Even if the release were considered parole under 8 C.F.R. § 212.5, per the regulations, the
3 parole is not terminated until the expiration of the time or the purpose for which the parole was
4 authorized. See 8 C.F.R. § 212.5(e)(2). The Respondents have provided no written notice of the
5 reasons for the termination and the charging document was issued prior to his custody; therefore, the
6 issuance of a charging document did not end his parole. See 8 C.F.R. § 212.5(e)(2)(i).

7
8 **Second Cause of Action**
Violation of the Administrative Procedure Act (APA)
Unlawful Denial of Bond

9 26. As argued above, the mandatory detention provision at 8 U.S.C. §1225(b)(2) do not apply
10 to Mr. Mena Torres as a noncitizen residing in the United States who is subject to grounds of
11 inadmissibility because he entered the United States without being admitted. Such noncitizens are
12 detained under § 1226(a), unless they are subject to another detention provision, such as §1225(b)(1),
13 § 1226(c), or § 1231. His continued detention under this statute violates the APA as it is arbitrary,
14 capricious, and not in accordance with the law.

15
16 **Third Case of Action**
Violation of the Due Process Clause of the Fifth Amendment:
Right to Review of Civil Detention Decision by a Neutral Arbiter

17 27. The Due Process Clause guarantees persons in civil detention timely review of the
18 decision to detain. Mr. Mena Torres timely filed his appeal of the Immigration Court's August 25,
19 2025 decision on September 3, 2025. He holds no hope of receiving a timely review of his custody at
20 the Board of Immigration Appeals (BIA). According to the agency's own data, during FY 2024, the
21 agency's *average* processing time for a bond appeal was 204 days, or nearly seven months (emphasis
22 added). This processing time defies the Due Process Clause and makes appellate review at the BIA
23 effectively meaningless.
24

25
26 **THE BALANCE OF EQUITIES TIPS SHARPLY IN PETITIONER'S FAVOR**

1 28. Mr. Mena Torres has lived in the United States since 2016, when he arrived as a 12-year-
2 old child. He has no criminal history and has been found by the Executive Branch to not constitute a
3 danger to the community or flight risk. He completed high school here and is gainfully employed as a
4 restaurant manager. Up until his detention, he was enrolled in community college and working full
5 time. His co-workers and superiors provided glowing recommendations in support of his release from
6 custody, which helped the Tacoma Immigration Court make the determination that he is not a danger
7 to the community. Finally on this point, there is nothing suggesting there is any equitable reason
8 counseling in favor of the government over Mr. Mena Torres. Indeed, the government's conduct in
9 this and other recent immigration detention scenarios strongly suggests that ICE ERO is being
10 deployed against communities like Mr. Mena Torres', to stoke feelings of fear and powerlessness,
11 create a climate of intimidation, and to defile and vandalize the equities of community members like
12 Mr. Mena Torres.
13

14 **THE PUBLIC INTEREST SUPPORTS INJUNCTIVE RELIEF**

15 29. The public has an interest in the removal of unlawfully present noncitizens, particularly
16 dangerous ones, and by extension the detention of dangerous noncitizens pending removal. See *Nken*,
17 556 U.S. at 1753. But there is a public interest too in enforcement of the lawful protections our nation
18 offers to all persons within its jurisdiction. *Id.* ("there is a public interest in preventing aliens from
19 being wrongfully removed, particularly to countries where they are likely to face substantial harm").
20 The public interest supports detention of persons only when they have been found to meet the
21 prerequisites for detention according to lawful procedures and standards.
22

23 30. Respondents' decision to re-detain him and to deem him subject to mandatory detention
24 despite having been released on his own recognizance for the past seven to eight years (during which
25 time there were never any problems with law enforcement or other issues), is facially arbitrary and
26 irrational. It appears to have little to do with Congress' interest in enforcing Mr. Mena Torres
27 departure from the United States—as it has not sought to expeditiously resolve any of Mr. Mena
28

1 Torres' claims for relief such that he might be removed in a compressed time frame. The federal
2 government has no legitimate governmental interest in imposing draconian custody conditions on civil
3 immigration detainees.

4 31. This young man has no criminal history. He participates meaningfully in society through
5 his time at school and at work. He has the support of a loving family. The long-term detention of an
6 individual such as Mr. Mena Torres makes a mockery of the lawful protections the United States has
7 to offer the persons who live within its boundaries. That mockery leads to an erosion of public trust.

8 **RELIEF SOUGHT**

9 32. Mr. Mena Torres respectfully requests that the Court grant the following relief:

10 33. Take jurisdiction over this matter and waive prudential exhaustion on the grounds of
11 irreparable injury and futility.

12 34. That the Court issue an immediate temporary restraining order pending a hearing on the
13 motion for preliminary injunction, that enjoins Respondents, their officers, agents, servants,
14 employees, and those acting in concert with them, from continuing to detain Mr. Mena Torres or from
15 re-detaining him prior to the adjudication of his I-730 petition absent exigent circumstances.

16 35. In the alternative, that the Court issue a temporary restraining order pending a hearing on
17 the motion for preliminary injunction, ordering the Immigration Court's bond order be given effect
18 \$5,000 be given effect.

19 36. That the Court issue an order to show cause why a preliminary injunction should not
20 issue to similarly enjoin Respondents, and that the Court set a hearing on the motion for a preliminary
21 injunction.

22
23 Dated: September 5, 2025

24 Respectfully submitted,

25 /s/ Manuel F. Rios, III

26 MANUEL F. RIOS III

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VERIFICATION

I represent Petitioner, Keneth Mena Torres, and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing *Ex Parte* Application for Temporary Restraining Order and Motion for Preliminary Injunction are true and correct to the best of my knowledge.

Dated: September 5, 2025

Respectfully submitted,

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EX PARTE APPLICATION FOR TRO AND
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