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

Alma Lucero SANDOVAL
HERNANDEZ;
Osman Arturo MENDEZ DE LEON;
Juan Jose LOPEZ REYES;
Pedro RODRIGUEZ HERNANDEZ;
Sinforoso SALGADO;
Narciso MODESTO CRUZ;
Josefina ORTEGA ZAMUDIO;
Luis HERNANDEZ MENESES;
Anastasio SANCHEZ JAVIER,

Petitioners,

v.

Kristi NOEM, Secretary, U.S.
Department of Homeland Security;
Pamela BONDI, U.S. Attorney General;
Todd LYONS, Acting Director,
Immigration and Customs Enforcement;
Ernesto SANTACRUZ JR., Acting
Director, Los Angeles Field Office,
Immigration and Customs Enforcement,
Enforcement and Removal Operations;
Feretí SEMAIA, Warden, Adelanto ICE
Processing Center; EXECUTIVE
OFFICE FOR IMMIGRATION
REVIEW; IMMIGRATION AND
CUSTOMS ENFORCEMENT; U.S.
DEPARTMENT OF HOMELAND
SECURITY,

Respondents.

Case No. 5:25-cv-2563

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

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

7 Petitioners seek this emergency relief because their continued detention
8 without an initial bond hearing is depriving Petitioners of statutory and
9 constitutional rights and is causing immediate and irreparable injury in the form of
10 the unlawful deprivation of their liberty.

11 Petitioners also seek a temporary restraining order enjoining the Respondents
12 from relocating Petitioners outside of the Central District of California pending
13 final resolution of this case.

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

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

19 Respondents oppose this TRO Application.
20

21 Dated: September 29, 2025

Respectfully submitted,

22 s/ Niels W. Frenzen

23 NIELS W. FRENZEN

24 JEAN REISZ

25 USC GOULD SCHOOL OF LAW,
26 IMMIGRATION CLINIC

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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, L.R. 7-19.1, and L.R. 65-1, I hereby certify that on September 26, 2025 at 2:00 PM, I spoke by telephone with Daniel Beck, AUSA, Chief, Complex and Defensive Litigation Section, U.S. Attorney's Office, Central District of California. Prior to our conversation, on September 25th, I emailed Mr. Beck a summary of the parties and claims. Mr. Beck indicated that Respondents opposed a TRO.

I will provide 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 shortly after filing the pleadings via CM/ECF.

Dated: September 29, 2025

Respectfully submitted,

s/ Niels W. Frenzen

NIELS W. FRENZEN

JEAN REISZ

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