

1 Sabrina Damast (CA SBN #305710 and NY SBN #5005251)
2 Amy Lenhert (CA Bar #227717)
3 Rocio La Rosa (CA Bar #314831)
4 Law Office of Sabrina Damast, Inc.
5 510 West 6th Street, Suite 330
6 Los Angeles, CA 90014
7 Telephone: (323) 475-8716
8 Emails: sabrina@sabrinadamast.com
9 amy@sabrinadamast.com
10 rocio@sabrinadamast.com

11 Counsel for Petitioner
12 Laura Beatriz Punina Chimbolema

13 UNITED STATES DISTRICT COURT FOR THE
14 CENTRAL DISTRICT OF CALIFORNIA

15 Laura Beatriz Punina Chimbolema, 

16 
17 Petitioner,
18 v.

Case No. 5:25-cv-02578

19 PAMELA BONDI, in her official capacity as
20 Attorney General,

21 KRISTI NOEM, in her official capacity as
Secretary of the Department of Homeland
Security,

U.S. DEPARTMENT OF HOMELAND
SECURITY,

F. SEMAIA, in his official capacity as Warden of
Adelanto Detention Facility,

ERNESTO SANTACRUZ, JR., in his official
capacity as Acting ICE Field Office Director,
Respondents.

PETITIONER'S MOTION
FOR A TEMPORARY
RESTRAINING ORDER

1
2 Petitioner, by and through her undersigned counsel, hereby files this motion
3 for a temporary restraining order pursuant to Fed. R. Civ. P. 65(d). Petitioner seeks
4 an order to preserve the status quo prior to her unlawful detention – namely, her
5 release on an order of her own recognizance (OREC).

6 The TRO sought by Petitioner is an order: (1) requiring Respondents to
7 immediately release her on her OREC and enjoining them from re-detaining her
8 absent further order of this Court; (2) in the alternative, ordering Petitioner's
9 immediate release from Respondents' custody and enjoining Respondents from re-
10 detaining her unless they demonstrate at a pre-deprivation bond hearing, by clear
11 and convincing evidence, that she is a flight risk or danger to the community, such
12 that her physical custody is required. Petitioner also requests the Court schedule
13 oral argument as soon as the Court's calendar allows and the parties are available,
14 should it be necessary to resolve this motion.

15 WHEREFORE, for the reasons set forth in the accompanying memorandum
16 of points and authorities, Petitioner respectfully requests this Court to grant the
17 Temporary Restraining Order and set the case for further briefing.

18 **RESPECTFULLY SUBMITTED this 29th day of September, 2025**

/s/ Sabrina Damast

Sabrina Damast, CA Bar # 305710, NY Bar # 5005251

Amy Lenhart, CA SBN #227717

Rocio La Rosa, CA SBN#314831

Law Office of Sabrina Damast, Inc.

510 West 6th Street, Suite 330
Los Angeles, CA 90014
(O) (323) 475-8716
(E) sabrina@sabrinadamast.com
amy@sabrinadamast.com
rocio@sabrinadamast.com