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11 Counsel for Petitioner
12 Ovanes Gazazyan

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

15 Ovanes Gazazyan, A 

16 Petitioner,
17 v.

Case No. 5:25-cv-02599

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

20 KRISTI NOEM, in her official capacity as
21 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 Petitioner, by and through his undersigned counsel, hereby files this motion
2 for a temporary restraining order pursuant to Fed. R. Civ. P. 65(d). Petitioner
3 moves this Court to order his immediate release on an Order of Supervision
4 (OSUP), which restores the status quo in place before Respondents unlawfully
5 revoked his OSUP and re-detained him. Alternatively, Petitioner seeks an order
6 enjoining Respondents from transferring him out of this judicial district during the
7 pendency of his Petition for a Writ of Habeas Corpus or ordering them to return
8 him if he has already been transferred. Finally, Petitioner also seeks an order
9 barring Respondents from removing him to a third country without notice and an
10 opportunity to be heard on any fear of persecution or torture he has in that third
11 country.

12 Petitioner requests the Court schedule oral argument as soon as the Court's
13 calendar allows and the parties are available, should it be necessary to resolve this
14 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 1st day of October, 2025**

19 /s/ Sabrina Damast

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

Amy Lenhert, CA SBN #227717

Rocio La Rosa, CA SBN#314831

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