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9 **United States District Court**
Central District of California

10
11 Yuri Decyatnik,

12 Petitioner,

13 v.

14 Kristi Noem, et al.

15 Respondents.
16

No. 2:25-cv-10027-AH-PD

**Petitioner's Response in
Support of Preliminary
Injunction**

17
18 This Court issued a well-reasoned decision granting Decyatnik a
19 temporary restraining order (TRO). Docket 24. In that order, the Court
20 afforded the Government an opportunity to show cause why a
21 preliminary injunction should not issue. *Id.* at p. 5. They have not done
22 so.

23 The standards governing TROs and preliminary injunctions are
24 identical. *O.M. v. Nat'l Women's Soccer League, LLC*, 541 F. Supp. 3d
25 1171, 1177 (D. Or. 2021). Therefore, for the reasons in the Court's order
26

1 granting a TRO, and in Decyatnik's prior briefing and application, the
2 Court should issue a preliminary injunction.

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4 Respectfully submitted,

5 Cuauhtemoc Ortega
6 Federal Public Defender

7 Dated: January 8, 2026

8 By: /s/ Dale F. Ogden
9 Dale F. Ogden
10 Deputy Federal Public Defender

11 Attorneys for Petitioner
12 Yuri Decyatnik
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Certificate of Compliance

The undersigned certifies that this filing contains 94 words, which complies with the word limit of L.R. 11-6.1.

Dated: January 8, 2026

/s/ Dale F. Ogden

Dale F. Ogden