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*Attorneys for Petitioner*

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

**Alejandro DIAZ ORZUNA,**

Petitioner,

v.

Kristi NOEM, Secretary, Department of  
Homeland Security; Pam BONDI, Attorney  
General; EXECUTIVE OFFICE FOR  
IMMIGRATION REVIEW; Todd LYONS,  
Executive Associate Director of ICE  
Enforcement and Removal  
Operations (ERO); and David A. MARIN,  
Adelanto Immigration and Customs  
Field Office Director,

Respondents.

Civil Case No.: \_\_\_\_\_

**PETITIONER'S *EX PARTE*  
APPLICATION FOR  
COMPLAINT FOR  
TEMPORARY  
RESTRAINING  
ORDER AND ORDER TO  
SHOW CAUSE**

Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure,

Petitioner hereby moves the Court for emergency relief in the form of a

1 temporary restraining order directing Respondents to release him from their  
2 custody or to provide him with an individualized bond hearing before an  
3 immigration judge pursuant to 8 U.S.C. § 1226(a) within seven (7) days of  
4 issuance of an Order.  
5

6  
7 Petitioner also seeks a temporary restraining order enjoining  
8 Respondents from relocating him outside of the Central District of California  
9 pending final resolution of this case.  
10

11 Petitioner further moves for the issuance of an order to show cause as  
12 to why a preliminary injunction should not issue.  
13

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

18 Respondents have indicated that they will oppose this TRO application.  
19

20 Dated: October 28, 2025

21 Respectfully submitted,

22 /s/Jose R. Jordan, Esq.

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**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 October 27, 2025, I communicated with Daniel Beck, Chief, Complex and Defensive Litigation Section, U.S. Attorney's Office, Central District of California to inquire into whether Respondents would oppose a TRO. More specifically, I provided Mr. Beck with a copy of the Application for a Temporary Restraining Order, Memorandum of Points and Authorities, and Petition for Writ of Habeas Corpus to Mr. Beck by emailing copies thereof to [Daniel.Beck@usdoj.gov](mailto:Daniel.Beck@usdoj.gov) shortly after filing the pleadings via CM/ECF.

Dated: October 28, 2025

Respectfully submitted,

/s/Jose R. Jordan, Esq.

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