

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](mailto:sabrina@sabrinadamast.com)

9 [amy@sabrinadamast.com](mailto:amy@sabrinadamast.com)

10 [rocio@sabrinadamast.com](mailto:rocio@sabrinadamast.com)

11 Inna Parizher (CA SBN #270581)

12 Law Office of Inna Parizher

13 PO Box 1034

14 Glendale, CA 91209

15 Telephone: (310) 630-9499

16 Email: [InnaParizher@parizherimmigration.com](mailto:InnaParizher@parizherimmigration.com)

17 Counsel for Petitioner

18 Karpis Kochakyan

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

Karpis Kochakyan, Alien

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Petitioner,

v.

PAMELA BONDI, in her official capacity  
as Attorney General,

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.

Case No. 5:25-cv-02924

**PETITIONER'S  
MOTION FOR A  
TEMPORARY  
RESTRAINING ORDER**

Petitioner, by and through his undersigned counsel, hereby files this motion for a temporary restraining order pursuant to Fed. R. Civ. P. 65(d). Petitioner seeks an order to preserve the status quo and to enjoin Respondents from transferring him out of this judicial district during the pendency of his Petition for a Writ of Habeas Corpus or ordering them to return him if he has already been transferred.

The TRO sought by Petitioner is an order barring Respondents from transferring him out of this judicial district or removing him to a third country without notice and an opportunity to be heard on any fear of persecution or torture he has in that third country. Petitioner also requests that the Court order him immediately released on an Order of Supervision. Petitioner also requests the Court schedule oral argument as soon as the Court's calendar allows and the parties are available, should it be necessary to resolve this motion.

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

**RESPECTFULLY SUBMITTED this 3rd day of November, 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](mailto:sabrina@sabrinadamast.com)  
[amy@sabrinadamast.com](mailto:amy@sabrinadamast.com)  
[rocio@sabrinadamast.com](mailto:rocio@sabrinadamast.com)

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Law Office of Inna Parizher  
PO Box 1034  
Glendale, CA 91209  
Telephone: (310) 630-9499  
Email: [InnaParizher@parizherimmigration.com](mailto:InnaParizher@parizherimmigration.com)