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

12
13 MODOU CAMARA,

14 Petitioner,

15 v.

16 MARK BOWEN, Warden, Adelanto
17 Detention Facility;
18 JAIME RIOS, Acting Field Office
19 Director, Los Angeles Field Office, U.S.
20 Immigration and Customs Enforcement;
21 TODD M. LYONS, Acting Director, U.S.
22 Immigration and Customs Enforcement;
23 KRISTI NOEM, Secretary of U.S.
24 Department of Homeland Security; and
25 PAMELA JO BONDI, Attorney General
26 of the United States,

27 Respondents.
28

CIVIL CASE NO.: 2:25-cv-10842-SB-
AGR

**MOTION FOR EMERGENCY
TEMPORARY RESTRAINING
ORDER**

1 Petitioner Modou Camara, through counsel, pursuant to Fed.R. Civ. P.65(b)
2 hereby requests that this Court temporarily enjoin Respondents from removing him
3 from the continental United States while this temporary injunction motion can be
4 decided, for the reasons stated in the accompanying Memorandum of Law and
5 exhibits thereto.
6

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8 Notice has been given to counsel for Respondents by email and by means of
9 filing this motion and all attachments thereto on this Court's CM/ECF system.
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12 Dated: November 19, 2025

Respectfully submitted,

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14 /s/ Jane Oak

Jane Oak, Esq.

Attorney for Petitioner
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Certificate of Service

I, the undersigned, hereby certify that on this date, I uploaded the foregoing, with all attachments thereto, to this court's CM/ECF system, which will send a Notice of Electronic Filing (NEF) to all case participants and by email to the following individuals:

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Dated: November 19, 2025

Respectfully submitted,

/s/ Jane Oak
Jane Oak, Esq.
Attorney for Petitioner