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Attorney for Petitioner

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

**LUIS ALBERTO RINCON-
CASTILLO,**

Petitioner

vs.

RON MURRAY, Warden of Mesa

Verde ICE Processing Center;

SERGIO ALBARRAN, Field

Office Director of Enforcement

and Removal Operations, San

Francisco Field Office; **FIELD**

OFFICE DIRECTOR,

Enforcement and Removal

Operations, San Jose Field Office;

TODD M. LYONS, Acting

Director of the United States

Immigration and Customs

Enforcement; **KRISTI NOEM**,

Secretary of the United States

Department of Homeland Security;

PAMELA JO BONDI, United

States Attorney General, *in their
official capacities,*

Respondents

) CASE NO.

) PETITIONERS' EX PARTE

) APPLICATION FOR

) TEMPORARY RESTRAINING

) ORDER AND ORDER TO SHOW

) CAUSE

1 Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure, Petitioner hereby
2 moves the Court for emergency relief in the form of a temporary restraining order directing
3 Respondents to release Petitioner from his custody with no additional conditions of release that
4 were not imposed prior to his detention in 2025 or to provide Petitioner with individualized bond
5 hearing before an immigration judge pursuant to 8 U.S.C. § 1226(a).

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

9
10 Petitioner further moves for the issuance of an order to show cause as to why a
11 preliminary injunction should not issue.

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

15 Undersigned counsel has contacted Assistant U.S. Attorneys Adrian Kinsella
16 (Adrian.Kinsella@usdoj.gov) and Joseph Frueh (Joseph.Frueh@usdoj.gov) to ascertain
17 Respondents' position regarding the TRO and is awaiting their reply.

18
19 Respectfully submitted,

20 Date: November 21, 2025

By: /s/ Connie Chan
Connie Chan
Attorney for Petitioner

PROOF OF SERVICE

I, the undersigned, declare that my office is in San Francisco, California. I am over the age of eighteen (18) years and not a party to the action within. My business address is 405 Sansome Street, 2nd Floor, San Francisco, CA 94111. On November 21, 2025, I served the following documents: **PETITIONERS' EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE** by placing a true and correct copy in a sealed envelope, each addressed as follows:

Ron Murray
Mesa Verde ICE Processing Center
425 Golden State Avenue
Bakersfield, CA 93301

Sergio Albarran
San Francisco Field Office
U.S. Immigration and Customs Enforcement
630 Sansome Street
Rm 590
San Francisco, CA 94111

Todd M. Lyons
U.S. Immigration and Customs Enforcement
500 12th Street SW
Washington, DC 20536

Kristi Noem
U.S. Department of Homeland Security
2801 Nebraska Avenue NW
Washington, D.C. 20528

Pamela Jo Bondi
950 Pennsylvania Avenue NW
Washington, DC 20530-0001

Civil Process Clerk
U.S. Attorney's Office
501 I Street, Suite 10-100
Sacramento, CA 95814

Field Office Director

1 San Jose Field Office
2 U.S. Immigration and Customs Enforcement
3 393 Blossom Hill Road
4 San Jose, California 95123

5 **By mail.** I am readily familiar with the business for collection and processing of
6 correspondence for mailing in the United States Postal Service and that this document, with
7 postage fully prepaid, will be deposited with the United States Postal Service this date in the
8 ordinary course of business.

9 I declare under the penalty of perjury that the foregoing is true and correct. Executed on
10 November 21, 2025, at San Francisco, California.

11 /s/ Connie Chan
12 Connie Chan
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