

1 Connie Chan
2 Connie Chan & Associates, P.C.
3 405 Sansome Street, 2nd Floor
4 San Francisco, CA 94111
5 Tel: 415-956-4809
6 Fax: 415-956-3759
7 Email: cc@connieychan.com

8 Attorney for Petitioner

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

**ALEX URIEL MORALES-
FLORES,**

Petitioner

vs.

TONYA ANDREWS, Facility
Administrator of the
Golden State Annex Detention
Facility; **SERGIO ALBARRAN**,
Field Office Director of
Enforcement and Removal
Operations, San
Francisco 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.**
)
) **PETITIONER'S 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 immediately release Petitioner from his custody with no additional conditions of
4 release that were not imposed prior to his detention in 2025 or to provide Petitioner with
5 individualized bond hearing before an immigration judge pursuant to 8 U.S.C. § 1226(a).
6

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

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 25, 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 25, 2025, I served the following documents: **PETITIONER'S 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:

Tonya Andrews
Facility Administrator
Golden State Annex Detention Facility
611 Frontage Rd
McFarland, CA 93250

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

/s/ Connie Chan
Connie Chan