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

9 JAWAD GHOLAMI,
10 ALI REZA GHOLAMI,
11
12 Petitioners,

13 vs.

14 CHRISTOPHER CHESTNUT, warden
15 of California City Detention Center;
16 MINGA WOFFORD, Administrator of
17 Mesa Verde ICE Detention Center;
18 SERGIO ALBARRAN, San Francisco
19 Field Office Director, Immigration and
20 Customs Enforcement and Removal
21 Operations ("ICE/ERO");
22 TODD LYONS, Acting Director of
23 Immigration Customs Enforcement
24 ("ICE");
25 KRISTI NOEM, Secretary of the
26 Department of Homeland Security
27 ("DHS");
28 PAMELA BONDI, Attorney General of
the United States,
U.S. DEPARTMENT OF HOMELAND
SECURITY;
U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT;
Respondents.

Case No.: **1:25-cv-01644-DAD-DMC**

**APPLICATION FOR TEMPORARY
RESTRAINING ORDER AND
ORDER TO SHOW CAUSE**

1 Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure,
2 Petitioners Jawad Gholami and Ali Reza Gholami hereby move the Court for
3 emergency relief in the form of a temporary restraining order directing
4 Respondents to immediately release Petitioners from their custody and enjoining
5 the Respondents from relocating Petitioners outside of the Eastern District of
6 California pending further Order of the Court.
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9 Petitioners further move for the issuance of an order to show cause as
10 to why a preliminary injunction should not issue.
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12 This application is supported by the Memorandum of Points and
13 Authorities, accompanying exhibits, and any additional submissions that may be
14 considered by the Court.
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18 Dated: December 9, 2025

Respectfully Submitted,

21 /s/Brian J. McGoldrick
22 Brian J. McGoldrick
23 Counsel for the Respondent
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CivLR 231(c)(5)

Pursuant to Rule 65(b)(1)(B) of the Federal Rules of Civil Procedure and CivLR 231(c)(5), I hereby certify that on December 9, 2025, at approximately 9:43 a.m. I emailed the U.S. Attorney's Office 2241 Unit and informed them that my office was preparing to file this *ex parte* application for TRO on Tuesday, December 9, 2025. I will provide a copy of the Application for a Temporary Restraining Order, Memorandum of Points and Authorities, Supporting Exhibits, and Petition for Writ of Habeas Corpus to the U.S. Attorney's Office for the Eastern District of California by email immediately after the pleadings are filed via ECF on December 9, 2025.

Dated: December 9, 2025

/s/Brian J. McGoldrick
Brian J. McGoldrick, Esq
Pro Bono Counsel for Respondent

CERTIFICATE OF SERVICE

I, Brian J. McGoldrick, CERTIFY

I am over the age of 18 and not a party to this matter. My business address is
4916 Del Mar Avenue, San Diego, CA 92107. On December 9, 2025, I served a
copy of this Application for TRO by email to the following individuals:

United States Attorney's Office
Robert E. Coyle United States Courthouse
2500 Tulare Street, Suite. 4401
Fresno, CA 93721
Email: usacae.ecf2241@usdoj.gov

/s/Brian J. McGoldrick
Brian J. McGoldrick, Esq.
Counsel for Respondent