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UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA

MERI PETROSYAN,
Alien # [redacted],

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-3240

PETITIONER'S MOTION FOR A TEMPORARY RESTRAINING ORDER

Petitioner, Meri Petrosyan, by and through her 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 prior to her unlawful detention – namely, her release on her own recognizance.

The TRO sought by Petitioner is an order: (1) requiring Respondents to immediately release Petitioner on her own recognizance and enjoining them from re-detaining her absent further order of this Court; (2) in the alternative, ordering Petitioner's immediate release from Respondents' custody and enjoining Respondents from re-detaining her unless Respondents demonstrate at a pre-deprivation bond hearing, by clear and convincing evidence, that Petitioner is a flight risk or danger to the community, such that her physical custody is required. 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 2nd day of December, 2025

/s/ Amy Lenhert
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