

Sabrina Damast (CA SBN #305710 and NY SBN #5005251)

Amy Lenhert (CA SBN #227717)

Rocio La Rosa (CA SBN #314831)

Law Office of Sabrina Damast, Inc.

510 West 6th Street, Suite 330

Los Angeles, CA 90014

Telephone: (323) 475-8716

Email: sabrina@sabrinadamast.com

amy@sabrinadamast.com

rocio@sabrinadamast.com

Counsel for Petitioner

Angel Diaz Moreno

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

ANGEL DIAZ MORENO, 



WHEREFORE, for the reasons set forth in the accompanying memorandum

Case No. 1:25-cv-01806-

KES-EPG

Petitioner,

v.

Temporary Restraining Order and set the case for further briefing.

Kristi Noem, in her official capacity as Secretary
of the Department of Homeland Security;

PETITIONER'S MOTION
FOR A TEMPORARY
RESTRAINING ORDER

Pamela Bondi, in her official capacity as
Attorney General;

Christopher Chestnut, in his official capacity as
Warden of California City Detention Facility;

Sergio Albarran, in his official capacity as ICE
Field Office Director,

U.S. Department of Homeland Security;

U.S. Department of Justice;

Sabrina Damast, CA Bar # 305710, NY Bar # 5005251
Law Office of Sabrina Damast, Inc.
510 West 6th Street, Suite 330
Los Angeles, CA 90014
(O) (323) 475-8716
(E) sabrina@sabrinadamast.com

1 Respondents.

2
3 Petitioner, by and through his undersigned counsel, hereby files this motion
4 for a temporary restraining order pursuant to Fed. R. Civ. P. 65(d). Petitioner seeks
5 an order releasing him immediately from ICE custody, or alternatively, an order
6 requiring Respondents to provide him with a bond hearing under 8 U.S.C.
7 § 1226(a).

8 Petitioner also requests the Court schedule oral argument as soon as the
9 Court's calendar allows and the parties are available, should it be necessary to
10 resolve this motion.

11 WHEREFORE, for the reasons set forth in the accompanying memorandum
12 of points and authorities, Petitioner respectfully requests this Court to grant the
13 Temporary Restraining Order and set the case for further briefing.

14 **RESPECTFULLY SUBMITTED this 13th day of December, 2025**

/s/ Sabrina Damast

15 Sabrina Damast, CA Bar # 305710, NY Bar # 5005251

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