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7
8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 Raphael GEVORGYAN,

11 Petitioner,

12 v.

13 Kristi NOEM, Secretary, U.S.
14 Department of Homeland Security;
15 Pamela BONDI, U.S. Attorney General;
16 Todd LYONS, Acting Director,
17 Immigration and Customs Enforcement;
18 Jaime RIOS, Acting Director, Los
19 Angeles Field Office, Immigration and
20 Customs Enforcement, Enforcement and
21 Removal Operations; Fereti SEMAIA,
22 Warden, Adelanto ICE Processing
23 Center; IMMIGRATION AND
24 CUSTOMS ENFORCEMENT; and U.S.
25 DEPARTMENT OF HOMELAND
26 SECURITY,

27 Respondents.
28

Case No. 5:25-cv-03408

**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
2 hereby moves the Court for emergency relief in the form of a temporary restraining
3 order ("TRO").
4

5 Petitioner seeks an order enjoining Respondents from transferring him out of
6 this judicial district during the pendency of his Petition for a Writ of Habeas Corpus
7 or ordering them to return him if he has already been transferred. Petitioner also
8 moves this Court to order his immediate release on an Order of Supervision (OSUP),
9 which restores the status quo in place before Respondents unlawfully revoked his
10 OSUP and re-detained him, and to enjoin Respondents from re-detaining him absent
11 order of this Court or absent the provision of an informal interview where Petitioner
12 can contest the reason for the revocation of his OSUP and demonstrate that his
13 removal is not reasonably foreseeable. Finally, Petitioner also seeks an order barring
14 Respondents from removing him to a third country without notice and an opportunity
15 to be heard on any fear of persecution or torture he has in that third country.
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20 Petitioner seeks this emergency relief because his re-detention is depriving
21 Petitioner of constitutional rights and is causing immediate and irreparable injury in
22 the form of the unlawful deprivation of his liberty.
23

24 Petitioner requests the Court schedule oral argument as soon as the Court's
25 calendar allows and the parties are available, should it be necessary to resolve this
26 motion.
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28

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

3
4 This application is supported by the Memorandum of Points and Authorities,
5 accompanying exhibits, as well as any additional submissions that may be considered
6 by the Court.

7
8 Respondents oppose this motion. *See* attached Certificate of Counsel.

9
10 DATED: December 16, 2025

s/ Keli M. Reynolds
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CERTIFICATE OF COUNSEL

Pursuant to Rule 65(b)(1)(B) of the Federal Rules of Civil Procedure, L.R. 7-19.1, and L.R. 65-1, I hereby certify that on December 15, 2025 at approximately 8:00pm, I sent an email to Daniel Beck, AUSA, Chief, Complex and Defensive Litigation Section, U.S. Attorney's Office, Central District of California. In the email, I provided Mr. Beck a summary of Petitioner's claims. Mr. Beck has responded that Respondents oppose this motion.

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 Mr. Beck by emailing copies to Daniel.Beck@usdoj.gov shortly after filing the pleadings via CM/ECF.

Respectfully Submitted,

DATED: December 16, 2025

s/ Keli M. Reynolds
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