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10 Attorney for Petitioner, KAVEH MOMTAZIAN

11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
13 LOS ANGELES, CALIFORNIA

14 KAVEH MOMTAZIAN

15 Petitioner,

16 V.

17
18 KRISTI NOEM, Secretary of Homeland
19 Security; PAMELA J. BONDI,
20 Attorney General of the US; THOMAS
21 GILES, LA Field Office Director, ICE-
22 ERO; JAMES PILKINGTON, Assistant
23 Field Office Director, Adelanto
24 Detention Facility; Warden, Geo Group
25 Inc, Adelanto Detention Facility and,
26 DOES 5 through 10, inclusive, Jointly
27 and Severally.

28 Respondents.

} CASE NO.

} PETITIONER'S REPLY TO
} RESPONDENT'S REPLY TO
} PETITIONER'S MOTION FOR A
} TEMPORARY RESTRAINING
} ORDER AND ORDER TO SHOW
} CAUSE RE: PRELIMINARY
} INJUNCTION

1 Petitioner, by and through his undersigned counsel, hereby REPLYs to the
2 Government's REPLY to Petitioner's motion for a temporary restraining order
3 (TRO).
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5 WHEREFORE, for the reasons set forth in the memorandum of points and
6 authorities along with the fact that the Government did not have arguments against
7 the TRO, Petitioner respectfully requests this Court to grant the TRO immediately
8 and enjoin the government from re-detaining and/or moving Petitioner.
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11 Dated: December 24, 2025

Respectfully submitted,
BERJIS | MYERS PLC

14 /s/ Robert E Myers _____
15 Robert Myers, Esq.
16 Counsel for Petitioner
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