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8 Counsel for Petitioner

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10 **UNITED STATES DISTRICT COURT FOR THE**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 Roni DerSarkissian,

13 Petitioner,

14 v.

15 Kristi NOEM, Secretary, Department of
16 Homeland Security; Todd LYONS, in his
17 official capacity as Acting Director of U.S.
18 Immigration and Customs Enforcement
19 (ICE); Pam BONDI, Attorney General of the
20 United States; Jaime RIOS, Director, Los
21 Angeles ICE Field Office; and Fereti
22 SEMAIA, Warden, Adelanto ICE Processing
23 Center.

24 Respondents.

No. 5:25-cv-03482-SPG-BFM

PETITIONER'S REPLY TO *EX*
PARTE APPLICATION FOR
TEMPORARY RESTRAINING
ORDER AND ORDER TO SHOW
CAUSE RE: PRELIMINARY
INJUNCTION

Immigration Case

1 Petitioner respectfully replies to Respondent's December 23, 2025 Opposition
2 to his Application for Temporary Restraining Order. Dkt # 7. Petitioner has been held
3 for *six months* and has not been removed. Respondents should not be afforded
4 additional time while Petitioner continues to be held without legal authority.

5 Further, Respondents request time to "investigate Petitioner's allegations that
6 he or Respondents do not have his original birth certificate and the status of the
7 issuance of Petitioner's travel documents to Iran." Dkt # 7. However, the September
8 15, 2025 letter from the Embassy of Pakistan, Interests Section of the Islamic
9 Republic of Iran, is directed to Immigration and Customs Enforcement itself and
10 states that both the original birth certificate and passport are required to issue a travel
11 document. *See* Dkt # 4-1, Tolchin Dec. Exh. D. Petitioner has already explained that
12 he does not have these documents. *See* Dkt # 4-1, Tolchin Dec. Exh. C. Petitioner has
13 met his burden in establishing that there is good reason to believe that he cannot be
14 removed, and Respondents have not rebutted that showing. An order of immediate
15 release is warranted.

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17 Dated: December 23, 2025

Respectfully Submitted,

S/Stacy Tolchin

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