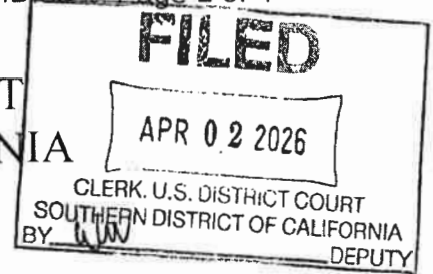


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA



Suren Pinachyan
Petitioner

v.

Warden.ET AL.
Respondents

**EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER TO
PREVENT TRANSFER AND REQUEST FOR RETURN TO THE NINTH CIRCUIT**

Petitioner Suren Pinachyan respectfully moves this Court for Temporary Restraining order to prevent further transfers and order his return to the Ninth Circuit,specifically to Otay Mesa Detention Center.

I.Emergency nature of this Motion

This motion is filed on emergency basic because Petitioner's continued transfers and lack of access to legal resources are preventing him from participating in his habeas proceedings.

Petitioner has a scheduled hearing on March,6,2026 but this unable to meaningfully prepare due to lack of access to Court documents and legal communication.

II.Violation of Court's transfer restriction order

On March, 6 2026 , this Court ordered that Petitioner shall not be transferred out of the district without advance notice and specific justification.

Despite this order,Petitioner was transferred March, 6, 2026 from Port Isabel.Texas to Alexandria,Louisiana and subsequently to Pine Prairie.

These transfers occurred without Petitioner's knowledge of any Court notice and without providing him access to the Court's order.

This constitutes a violation of the Court's directive and interferes with Petitioner's access to the judicial process.

III.Petitioner has not received Court documents

Petitioner has not received any court correspondence regarding this case.

He was not informed that

*his habeas petition was accepted

*a response was filed by DHS

*a hearing was scheduled for March 30,2026

Petitioner only became aware of these developments through his spouse who accessed public information.

Court records indicate that mail was returned as undeliverable.

IV.Inability to respond to DHS Return

Petitioner has not received a copy of the DHS response filed in this case.

He has requested the document from ICE officers and through the law library but has received no response.

As a result,Petitioner is unable to prepare a meaningful reply or defend his rights in this proceeding.

V.Lack of access to legal resources

Due to repeated transfers,Petitioner has been denied consistant to

- *Legal mail
- *Law library
- *Communication with the court

Upon arrival at the Pine Prairie,Petitioner was placed in quarentine without access to legal resources.

These conditions severely restrict his ability to participate in his case.

VI.Ongoing prejudice and due process violaton

The combination of;

- *transfers in violation of the Court's order
- *failure to receive court documents
- *inability to access legal resources

Has deprived Petitioner of meaningful access to the Court and violates due process.

VII.Relief requested

WHEREFORE,Petitioner respectfully requests that the court;

- 1.Issue a Temporarry Restraining Order preventing and further transfers;
- 2.Order Respondents to return Petitioner to the Ninth Circuit,preferably to Otay Mesa Detention Center
- 3.Order Respondents to ensure Petitioner receives all Court filings immediately
- 4.Grant and additional relief the Court deems just and proper.

VIII. Court has already confirmed jurisdiction and Respondents must comply regardless of transfer

On March, 23, 2026, this Court issued an order confirming that it retains jurisdiction over this habeas petition despite petitioner's transfer outside the district.

The Court explicitly stated that jurisdiction is determined at the time the petition is filed and that a subsequent transfer does not divest the Court of jurisdiction.

The Court further ordered Respondent to inform the Court whether they will comply with its orders regardless of petitioner's current location.

Despite this clear directive, Petitioner's continued transfers and lack of access to legal resources have prevented him from meaningfully participating in this case.

These actions undermine the Court's jurisdiction and interfere with the administration of justice.

Respondents' conduct is inconsistent with the Court's order and effectively deprives Petitioner of the ability to litigate his habeas petition.

Accordingly intervention by this Court is necessary to ensure compliance with its prior order and protect Petitioner's right of access to the Court.

Without Court intervention, Respondents may continue actions that effectively nullify this Court's jurisdiction.

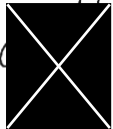
Respectfully submitted

Suren Pinachyan



Pine Prairie ICE Processing Center
Petitioner PRO SE

Date 24 March 2026



CERTIFICATE OF SERVICE

I, Suren Pinachyan, hereby certify that on this date I served a true and correct copy of the foregoing Emergency Motion for Temporary Restraining Order on Respondents by placing it in the institutional mail system for delivery to:

Office of the United States attorney
southern district of California
880 front street, room 6293
San Diego, CA 92101

executed on 24 March, 2026

Suren Pinachyan



petitioner se