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**Pro hac vice application forthcoming*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Osmin Antonio AYALA,

Petitioner,

Case No. 3:26-cv-03092

v.

SERGIO ALBARRAN, in his official capacity,
San Francisco Field Office Director, U.S.
Immigration and Customs Enforcement;

MARKWAYNE MULLINS, in his official
capacity, Secretary of the U.S. Department of
Homeland Security; and

TODD BLANCHE, in her official capacity,
Attorney General of the United States,

Respondents.

**EX PARTE MOTION FOR
TEMPORARY RESTRAINING
ORDER AND PRELIMINARY
INJUNCTION**

1 Pursuant to Rule 65(b) of the Federal Rules of Civil Procedure and Rule 65-1 of the Local Rules
2 of this Court, Petitioner Osmin Antonio Ayala hereby moves the Court for emergency relief in the form
3 of a temporary restraining order enjoining Respondents from detaining him pending further order of this
4 Court.

5 This application is supported by the Memorandum of Points and Authorities, his Petition for Writ
6 of Habeas Corpus and supporting exhibits, as well as any additional submissions that may be considered
7 by the Court. As set forth in the Points and Authorities in support of this Motion, Mr. Ayala raises that
8 he warrants a temporary restraining order due to his weighty liberty interest under the Due Process
9 Clause of the Fifth Amendment in avoiding unlawful detention.

10
11 Dated: April 10, 2026

IMMIGRANT LEGAL DEFENSE

12 By: /s/ Christina Lee

13 Christina Lee

Laura Polstein*

14 IMMIGRANT LEGAL DEFENSE

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15
16 *Pro hac vice admission forthcoming

17 *Attorneys for Petitioner*