SALGADO & PERALTA, P.A.
Mario Salgado, SBN: 128533
605 Market Street, Suite 1111
San Francisco, CA 94105
Tel: (415) 401-8699

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

Zoila Margarita Andrade Alvarado,

Petitioner,

v.

Christopher CHESTNUT in his official capacity as the Warden of the California City Detention Center operated by CORECIVIC, INC., a Maryland corporation; Markwayne MULLIN, Secretary of the Department of Homeland Security; Todd BLANCHE, U.S. Attorney General; in their official capacity; Moises BECERRA, in his official capacity as Field Office Director of Immigration and Customs Enforcement, Enforcement and Removal Operations.

Respondents.

Case Number: _____

PETITIONER'S NOTICE OF EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION & MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

[LOCAL RULE 231(c)(2),(d)(1)]

ORAL ARGUMENT REQUESTED

[LOCAL RULE 231(g)]

PLEASE TAKE NOTICE, Petitioner respectfully requests that the Court grant her ex parte emergency motion for a temporary restraining order and preliminary injunction to enjoin Respondents from continuing her detention in violation of statutes and the United States Constitution. [L.R. 230(b), 231(a)]. The grounds for this motion pursuant to are set forth in the writ of habeas corpus [L.R. 231(c)(1)], accompanying brief [L.R. 231(c)(3), (d)(2)(i)], declarations demonstrating irreparable injury [L.R. 231(c)(4), (d)(2)(ii)], exhibits in support thereof, and the applicable law. A proposed order also accompanies this motion. [L.R. 231(c)(6)-(8), (d)(2)(iii)]

Date: July 7, 2026,

Respectfully Submitted,
/s/ Mario Salgado
Mario Salgado,

CERTIFICATE OF SERVICE

I, Mario Salgado, am over the age of 18 years and maintain a business address located at 605 Market Street Suite 1111 in San Francisco, California 94105. I electronically served the **PETITIONER'S NOTICE OF EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION & MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION [LOCAL RULE 231(c)(2),(d)(1)]** to the United States Attorney's Office for the Eastern District of California; 2500 Tulare Street, Suite 4401, Fresno, CA 93721 via the court's filing system.

I swear under penalty of perjury under the laws of the United States of America that the foregoing is true and correct:

Date: July 7, 2026

/s/ Mario Salgado
Mario Salgado, Esq.