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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

Zoila Margarita Andrade Alvarado,

Petitioner,

v.

Christopher CHESTNUT et al,

Respondents.

Case Number: 1:26-cv-05230-DJC-CSK

PETITIONER'S NOTICE OF EMERGENCY MOTION FOR A TEMPORARY RESTRAINING ORDER AND EMERGENCY STAY OF TRANSFER PENDING ADJUDICATION OF HABEAS PETITION

[LOCAL RULE 231(c)]

EMERGENCY REVIEW REQUESTED DUE TO IMMINENT TRANSFER SCHEDULED FOR JULY 16, 2026

PLEASE TAKE NOTICE, Petitioner respectfully requests that the Court grant her ex parte emergency motion for a temporary restraining order and immediate administrative stay of transfer to enjoin Respondents from executing an imminent operational transfer outside the territorial jurisdiction of the Eastern District of California scheduled for July 16, 2026. [L.R. 230(b), 231(a)].

The urgent grounds for this motion are set forth in the accompanying Emergency Motion for a Temporary Restraining Order and Emergency Stay of Transfer, which details the imminent and irreparable statutory and due process harm that an out-of-state transfer would inflict upon Petitioner's mandatory Form I-693 adjustment of status medical examination scheduled for July 18, 2026, within this district.

This motion is further supported by the verified allegations set forth herein, underlying exhibits including the official ICE Form I-830E transfer notice, and applicable federal law. A proposed order also accompanies this emergency motion [L.R. 231(c)(6)].

Date: July 14, 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 A TEMPORARY RESTRAINING ORDER AND EMERGENCY STAY OF TRANSFER PENDING ADJUDICATION OF HABEAS PETITION** 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 14, 2026

/s/ Mario Salgado
Mario Salgado, Esq.