Arash Yasrebi
Yasrebi Law
1999 Harrison St 18th floor
Oakland, CA 94612
Tel: (415) 819-1898
Email: arash@yasrebilaw.com

Attorney for Petitioner

**UNITED STATES DISTRICT COURT**
**EASTERN DISTRICT OF CALIFORNIA**

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| MATIAS VELASCO-VALDEZ,<br><br>Petitioner<br><br>vs.<br><br>Warden of the Central Valley Annex Detention Center; **SERGIO ALBARRAN,** Field Office Director of Enforcement and Removal Operations, San Francisco Field Office; **TODD M. LYONS**, Acting Director of the United States Immigration and Customs Enforcement; **MARKWAYNE MULLIN,** Secretary of the United States Department of Homeland Security; **TODD BLANCHE**, United States Acting Attorney General, *in their official capacities,*<br><br>Respondents | **CASE NO. 1:26-at-2735**<br><br>**PETITIONER'S EX-PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE**<br><br>**ALIEN NUMBER** [redacted] |

Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure, Petitioner hereby moves the Court for emergency relief in the form of a temporary restraining order directing Respondents to immediately release Petitioner from custody with no additional conditions of release that were not imposed prior to his detention in 2026 or to provide Petitioner with individualized hearing before a neutral decisionmaker pursuant to 8 U.S.C. § 1226(a).

Petitioner also seeks a temporary restraining order enjoining the Respondents from transferring him outside of the District of Eastern California and the United States pending final resolution of this case.

Petitioner further moves for the issuance of an order to show cause as to why a preliminary injunction should not issue.

This application is supported by the accompanying exhibits, as well as any additional submissions that may be considered by the Court.

Undersigned counsel has contacted Assistant U.S. Attorneys office to ascertain Respondents' position regarding the TRO.

Respectfully submitted,

Date: July 9, 2026

By: /s/ Arash Yasrebi
Arash Yasrebi
Attorney for Petitioner