Tala Hartsough (SBN 230204)
CARECEN SF
P.O. Box 420427
San Francisco, CA 94142
(415) 642-4412
tala@carecensf.org

Pro Bono Counsel for Petitioner

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

J.C.Z.L.,

Petitioner,

v.

Minga WOFFORD, Facility Administrator, Mesa Verde ICE Processing Center; Sergio ALBARRAN, Acting Field Office Director, San Francisco Immigration and Customs Enforcement; David VENTURELLA, Acting Director, United States Immigration and Customs Enforcement; Markwayne MULLIN, Secretary of the United States Department of Homeland Security; Todd BLANCHE, Attorney General of the United States, acting in their official capacities,

Respondents.

Case No. _____

PETITIONER'S NOTICE OF MOTION AND *EX PARTE* MOTION FOR TEMPORARY RESTRAINING ORDER

NOTICE OF MOTION AND MOTION

PLEASE TAKE NOTICE as soon as it may be heard in the United States District Court for the Eastern District of California that Petitioner J.C.Z.L. will and hereby does move for a temporary restraining order pursuant to Federal Rule of Civil Procedure 65(b) and Civil Local Rule 231. Because Petitioner's detention is not authorized by statute and violates the Due Process Clause of the Fifth Amendment to the United States, Petitioner respectfully requests that this Court (1) Order Petitioner's immediate release from Respondents' custody pending these proceedings, (2) Enjoin Respondents from re-detaining J.C.Z.L. unless his re-detention is ordered at a custody hearing before a neutral arbiter in which the government bears the burden of proving, by clear and convincing evidence, that there is a material change in circumstances such as to justify his re-detention and Respondents provide Petitioner and his counsel at least seven days' notice prior to any such hearing; (3) At the time of Petitioner's release from custody, Respondents are required to return all of his personal property, including any personal property, documents and electronics; (4) Respondents are enjoined from imposing any new conditions of release, including GPS monitoring; (5) Enjoin Respondents from transferring J.C.Z.L. outside the jurisdiction of the Eastern District of California or removing him from the country pending the resolution of this case.

This motion is based on this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, and the accompanying Proposed Order; the Petition for Writ of Habeas Corpus; the concurrently filed Declaration of Tala Hartsough, with attached exhibits 1-2, including the Declaration of Petitioner's partner D.C.M; any other papers, evidence, and records on file in this action; and any other written or oral evidence or argument as may be presented at or before the time this motion is heard by the Court. A temporary restraining order

is warranted due to Petitioner's weighty interest in being subject to incarceration in violation of the law and without due process.

Consistent with Civil L.R. 231, Petitioner seeks relief at the earliest possible opportunity. Petitioner is filing this motion the same as his Petition for Writ of Habeas Corpus.

Pursuant to Civil L.R. 231(a), and as detailed further in the concurrently filed Declaration of Tala Hartsough, Counsel for Petitioner has provided Counsel for Respondents with notice of this Motion and advised Respondents of the relief sought. Counsel for Petitioner has emailed a copy of the filed habeas petition to Counsel for Respondents. Counsel for Petitioner has advised Counsel for Respondents that a Motion for Temporary Restraining Order would be forthcoming. Counsel for Petitioner will email Counsel for Respondents a copy of the Motion for Temporary Restraining Order and associated Memorandum of Points and Authorities immediately after filing them, and will inform Counsel for Respondents of the time and location of a hearing once it is set by the Court. As of this filing, Respondents have not stipulated to a temporary restraining order.

Dated: July 10, 2026

Respectfully Submitted,

/s/ Tala Hartsough
Tala Hartsough

CARECEN SF
P.O. Box 420427
San Francisco, CA 94142
(415) 642-4412
tala@carecensf.org

Pro Bono Counsel for Petitioner