Tania Linares Garcia (CA Bar #307980)
Christina Lee (CA Bar #230883)
Immigrant Legal Defense
1301 Clay Street, #70010
Oakland, CA 94612
Phone: (510) 473-2989
tania@ild.org

*Pro bono counsel for Petitioner*

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

Elmer VICENTE MENDEZ,
*Petitioner*,

v.

Ron MURRAY, Warden, Mesa Verde Detention Center;

Sergio ALBARRAN, Field Office Director, San Francisco Field Office, U.S. Immigration and Custom Enforcement, Enforcement and Removal Operations Division;

Markwayne MULLIN, Secretary, United States Department of Homeland Security;

Todd BLANCHE, Acting Attorney General of the United States,
*Respondents*.

Case No.

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

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

Pursuant to Rule 65(b) of the Federal Rules of Civil Procedure and Rule 231 of the Local Rules of this Court, Petitioner Elmer Vicente Mendez hereby moves the Court for emergency relief in the form of a temporary restraining order directing Respondents to immediately release him from civil detention. Petitioner has concurrently filed a brief in support of this motion, outlining the legal arguments grounding this motion. This motion is also supported by Mr. Vicente Mendez's Petition for a Writ of Habeas Corpus and supporting documents.

As set forth in the brief in support of this motion, Mr. Vicente Mendez warrants a temporary restraining order because he is likely to succeed on his challenge to his re-detention without a pre-deprivation hearing as unlawful under procedural process guarantees and the Trafficking Victims Protection Reauthorization Act (TVPRA). Mr. Vicente Mendez faces ongoing, irreparable harm absent emergency injunctive relief.

DATED this 13th day of July 2026.

/s/ Tania Linares Garcia
Tania Linares Garcia (CA# 307980)
Christina Lee (CA Bar #230883)
Immigrant Legal Defense
1301 Clay Street, #70010
Oakland, CA 94612
Phone: (510) 473-2989
tania@ild.org

*Pro bono counsel for Petitioner*