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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

Pedro VASQUEZ PERDOMO; Carlos Alexander OSORTO; and Isaac VILLEGAS MOLINA; Jorge HERNANDEZ VIRAMONTES; Jason Brian GAVIDIA; LOS ANGELES WORKER CENTER NETWORK; UNITED FARM WORKERS; COALITION FOR HUMANE IMMIGRANT RIGHTS; IMMIGRANT DEFENDERS LAW CENTER,

Plaintiffs,

v.

Kristi NOEM, in her official capacity as Secretary, Department of Homeland Security; Todd M. LYONS, in his official capacity as Acting Director, U.S. Immigration and Customs Enforcement; Rodney S. SCOTT, in his official capacity as Commissioner, U.S. Customs and Border Patrol; Michael W. BANKS, in his official capacity as Chief of U.S. Border Patrol; Kash PATEL, in his official capacity as Director, Federal Bureau of Investigation; Pam BONDI, in her official capacity as U.S. Attorney General; Ernesto SANTACRUZ JR., in his official capacity as Acting Field Office Director for Los Angeles, U.S. Immigration and Customs Enforcement; Eddy WANG, Special Agent in Charge for Los Angeles, Homeland Security Investigations, U.S. Immigration and Customs Enforcement; Gregory K. BOVINO, in his official capacity as Chief Patrol Agent for El Centro Sector of the U.S. Border Patrol; Jeffrey D. STALNAKER, in his official capacity as Acting Chief Patrol Agent, San Diego Sector of the U.S. Border Patrol; Akil DAVIS, in his official capacity as Assistant Director in Charge, Los Angeles Office, Federal Bureau of Investigation; Bilal A. ESSAYLI, in his official capacity as U.S. Attorney for the Central District of California,

Defendants.

Case No.: 2:25-cv-05605-MEMF-SP

**INTERVENORS' UNOPPOSED EX PARTE APPLICATION TO PARTICIPATE IN JULY 10 TRO HEARING**

[Filed Concurrently: Declaration of John L. Schwab; [Proposed] Order]

Judge: Hon. Maame Ewusi-Mensah Frimpong

1           **TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF**  
2 **RECORD:**

3           **PLEASE TAKE NOTICE** that Proposed Plaintiffs-Intervenors  
4 (“Intervenors”) the City of Los Angeles, the County of Los Angeles, the City of  
5 Culver City, the City of Montebello, the City of Monterey Park, the City of  
6 Pasadena, the City of Pico Rivera, the City of Santa Monica, and the City of West  
7 Hollywood hereby apply *ex parte* for an Order permitting Intervenors to participate  
8 in the July 10, 2025 hearing on (1) the July 2 Application for a Temporary  
9 Restraining Order (“TRO”) filed by Plaintiffs Coalition for Humane Immigrant  
10 Rights (“CHIRLA”) and Immigrant Defenders Law Center (“ImmDef”), ECF No.  
11 38; and (2) the July 3 TRO Application filed by Plaintiffs Pedro Vasquez Perdomo,  
12 Carlos Alexander Osorto, Isaac Villegas Molina, Jorge Hernandez Viramontes,  
13 Jason Brian Gavidia, the Los Angeles Worker Center Network, United Farm  
14 Workers, and CHIRLA, ECF No. 45.

15           As set forth in the accompanying Memorandum of Points and Authorities,  
16 Intervenors request leave to participate in the July 10 TRO Hearing to protect their  
17 distinct interests in maintaining law and order and preserving crucial tax revenues in  
18 the face of Defendants’ unlawful immigration raids—interests that are squarely  
19 implicated by Plaintiffs’ TRO Applications. *Ex parte* relief is necessary because  
20 Intervenors do not have sufficient time to file a regularly noticed motion to  
21 participate in the July 10 TRO Hearing, which was scheduled less than one week  
22 ago and which will be proceeding in two days.

23           This Application is based on this Notice of Application, the attached  
24 Memorandum of Points and Authorities, the accompanying Declaration of John L.  
25 Schwab, all other papers and records on file in this matter, and any other materials  
26 or argument the Court may receive.

27           Pursuant to Civil L.R. 7-19.1, Counsel for Intervenors attempted to meet and  
28 confer with counsel for all parties as soon as practicable before filing this

1 Application. Counsel for Intervenors informed Daniel A. Beck, Ryan Case  
2 Chapman, and Sean Skedzielewski, counsel for Defendants, via email on July 7,  
3 2025, of the date and substance of this *Ex Parte* Application, asked if Defendants  
4 intended to oppose, and offered to meet and confer. Schwab Decl. ¶ 2. On July 8,  
5 2025, counsel for Intervenors and counsel for Defendants met and conferred  
6 regarding the *Ex Parte* Application. *Id.* Following the meet and confer, counsel for  
7 Defendants provided the following statement: “The Defendants do not oppose the  
8 *ex parte* request to participate in the July 10 TRO hearing. The Defendants support  
9 fair, open, and transparent resolution of the issues. As with all hearings, the  
10 Defendants believe the hearing should be conducted in a way that is based upon the  
11 pleadings on file, is not unduly repetitive, and gives fair voice to argument by the  
12 opposing sides.” *Id.* Counsel for Intervenors also conferred with Plaintiffs’ counsel  
13 on July 7 regarding the date and substance of this Application. *Id.* ¶ 3. Plaintiffs do  
14 not oppose this Application. *Id.*

15 As required by Civil L.R. 7-19, the names, addresses, telephone numbers, and  
16 e-mail addresses of counsel for Defendants are:

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DATED: July 8, 2025

Respectfully submitted,

By:           /s/ John L. Schwab            
JOHN L. SCHWAB

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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. Introduction**

3 Over the past few weeks, Intervenor—the cities and county that the federal  
4 government has chosen as its epicenter for immigration raids—have seen their  
5 residents terrorized and their resources taxed by a campaign of unlawful detentions  
6 and seizures perpetrated by masked and heavily armed federal agents who choose  
7 their targets seemingly at random. Day in and day out, there is no telling who these  
8 federal agents will target or when they will strike, since they refuse to coordinate  
9 with local authorities. All that is certain is that Defendants’ aim is to instill  
10 maximum fear in Intervenor’s communities and wreak havoc on the economy of one  
11 of the most diverse and vibrant areas in the country. This must stop.

12 As such, Intervenor respectfully request leave to participate in the upcoming  
13 July 10 hearing on Plaintiffs’ TRO Applications (the “July 10 TRO Hearing”) to  
14 protect their distinct governmental and economic interests that are directly  
15 implicated by the relief Plaintiffs seek. As set forth in Intervenor’s pending Motion  
16 to Intervene and Complaint in Intervention, Defendants’ unlawful and increasingly  
17 aggressive immigration raids have obstructed Intervenor’s ability to perform critical  
18 law enforcement functions and have deprived Intervenor of essential tax revenues  
19 as local business owners shutter their stores and fearful residents remain in their  
20 homes. Plaintiffs’ TRO Applications raise urgent questions implicating public  
21 safety and economic stability within Intervenor’s jurisdictions—interests that are not  
22 adequately represented by any existing party to this action. Intervenor thus  
23 respectfully request that the Court grant Intervenor leave to participate in the July  
24 10 TRO Hearing.

1 **II. Argument**

2 **A. Intervenor Should Be Permitted to Participate in the July 10**  
3 **Hearing to Safeguard Their Distinct Interests**

4 Plaintiffs’ TRO Applications raise issues of grave concern for Los Angeles  
5 County, the City of Los Angeles, and the Los Angeles area cities that seek to  
6 intervene. And the TRO Applications, and their requests for temporary relief,  
7 directly implicate Intervenors’ interests in maintaining law and order and preserving  
8 essential tax revenues, interests that the existing Plaintiffs do not adequately  
9 represent. *See* Intervenors’ July 8, 2025 Motion to Intervene, ECF No. 61 (“Motion  
10 to Intervene”) at 18–19 & n.4.

11 In these circumstances, the Court has discretion to permit Intervenors to  
12 participate in the July 10 Hearing even if it has not yet ruled on the pending Motion  
13 to Intervene. *See, e.g., Spangler v. Pasadena City Bd. of Educ.*, 552 F.2d 1326,  
14 1329 (9th Cir. 1977) (noting district court’s discretion to allow limited participation  
15 prior to formal intervention); *In re Vargas*, 723 F.2d 1461, 1464 (10th Cir. 1983)  
16 (proposed intervenor participated in district court proceedings, including hearing on  
17 motion to quash, while motion to intervene was pending); *Azevedo v. Northland Ins.*  
18 *Co.*, No. 3:05-cv-195-BES-RAM, 2006 WL 3782833, at \*4 (D. Nev. Dec. 22, 2006)  
19 (courts may “allow persons not a party to the litigation to participate at some stage  
20 of the proceedings” even absent “formal intervention”).

21 Intervenors respectfully request that, given the speed at which this case has  
22 proceeded in the past week, and the importance of the issues in dispute, the Court  
23 exercise its discretion to permit their participation in the July 10 Hearing to ensure  
24 that Intervenors’ interests are fully and fairly considered.

25 **B. In the Alternative, Intervenors Should Be Permitted to Participate**  
26 **in the July 10 TRO Hearing as Amici Curiae**

27 To the extent the Court is not inclined to permit Intervenors to participate in  
28 the July 10 TRO Hearing before it has ruled on the Motion for Intervention,

1 Intervenor ask to be permitted to participate as amici curiae. “The district court has  
2 broad discretion to appoint amici curiae,” and courts regularly grant amicus status  
3 when nonparties, like Intervenor, have “unique information or perspective that can  
4 help the court beyond the help that the lawyers for the parties are able to provide.”  
5 *WildEarth Guardians v. Haaland*, 561 F. Supp. 3d 890, 905–06 (C.D. Cal. 2021)  
6 (quotations omitted); see *NGV Gaming, Ltd. v. Upstream Point Molate, LLC*, 355 F.  
7 Supp. 2d 1061, 1067 (N.D. Cal. 2005) (“District courts frequently welcome amicus  
8 briefs from non-parties concerning legal issues that have potential ramifications  
9 beyond the parties directly involved”). Intervenor seek to offer their unique  
10 perspectives at the July 10 TRO Hearing on how Defendants’ actions are affecting  
11 local governments and community members. Allowing Intervenor to participate in  
12 the July 10 TRO Hearing as amici curiae will thus provide the Court with  
13 Intervenor’s insights regarding the “potential ramifications” of the Court’s eventual  
14 TRO ruling “beyond the parties directly involved.” See *NGV Gaming*, 355 F. Supp.  
15 2d at 1067.

16 **C. Ex Parte Relief is Warranted**

17 A party seeking *ex parte* relief must demonstrate that (1) “the moving party’s  
18 cause will be irreparably prejudiced if the underlying motion is heard according to  
19 regular noticed motion procedures,” and (2) “the moving party is without fault in  
20 creating the crisis that requires *ex parte* relief.” *Immigrant Defs. L. Ctr. v. Noem*,  
21 No. CV 20-9893 JGB (SHKx), 2025 WL 1172442, at \*5 (C.D. Cal. Apr. 16, 2025)  
22 (quoting *Mission Power Eng’g Co. v. Cont’l Cas. Co.*, 883 F. Supp. 488, 492 (C.D.  
23 Cal. 1995)).

24 Both requirements are met here. *First*, Intervenor’s distinct interests in  
25 maintaining law and order and preserving essential business tax revenues for the  
26 benefit of their residents will be irreparably prejudiced if Intervenor are forced to  
27 file a regularly noticed motion to participate in a TRO hearing that is scheduled to  
28 occur two days from now. See *Immigrant Defs. L. Ctr.*, 2025 WL 1172442, at \*5;

1 see Mot. to Intervene at 7–13 (describing Intervenors’ interests). *Second*,  
2 Intervenors have not “creat[ed] the crisis that requires ex parte relief.” See  
3 *Immigrant Defs. L. Ctr.*, 2025 WL 1172442, at \*5. Plaintiffs’ TRO Applications  
4 were set for hearing less than one week ago, leaving Intervenors without sufficient  
5 time to file a regularly noticed motion. See ECF No. 42 (July 3, 2025 Order Setting  
6 CHIRLA/ImmDef TRO for hearing on July 10); ECF No. 51 (July 7, 2025 Order  
7 Setting Individual Plaintiffs’ TRO for Hearing on July 10). Intervenors are thus  
8 entitled to *ex parte* relief.

9 **III. Conclusion**

10 For the foregoing reasons, Intervenors respectfully request that the Court  
11 grant their Unopposed *Ex Parte* Application to participate in the July 10 TRO  
12 Hearing.

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1 DATED: July 8, 2025

Respectfully submitted,

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By:           /s/ John L. Schwab            
JOHN L. SCHWAB

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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

Pedro VASQUEZ PERDOMO; Carlos Alexander OSORTO; and Isaac VILLEGAS MOLINA; Jorge HERNANDEZ VIRAMONTES; Jason Brian GAVIDIA; LOS ANGELES WORKER CENTER NETWORK; UNITED FARM WORKERS; COALITION FOR HUMANE IMMIGRANT RIGHTS; IMMIGRANT DEFENDERS LAW CENTER,

Plaintiffs,

v.

Kristi NOEM, in her official capacity as Secretary, Department of Homeland Security; Todd M. LYONS, in his official capacity as Acting Director, U.S. Immigration and Customs Enforcement; Rodney S. SCOTT, in his official capacity as Commissioner, U.S. Customs and Border Patrol; Michael W. BANKS, in his official capacity as Chief of U.S. Border Patrol; Kash PATEL, in his official capacity as Director, Federal Bureau of Investigation; Pam BONDI, in her official capacity as U.S. Attorney General; Ernesto SANTACRUZ JR., in his official capacity as Acting Field Office Director for Los Angeles, U.S. Immigration and Customs Enforcement; Eddy WANG, Special Agent in Charge for Los Angeles, Homeland Security Investigations, U.S. Immigration and Customs Enforcement; Gregory K. BOVINO, in his official capacity as Chief Patrol Agent for El Centro Sector of the U.S. Border Patrol; Jeffrey D. STALNAKER, in his official capacity as Acting Chief Patrol Agent, San Diego Sector of the U.S. Border Patrol; Akil DAVIS, in his official capacity as Assistant Director in Charge, Los Angeles Office, Federal Bureau of Investigation; Bilal A. ESSAYLI, in his official capacity as U.S. Attorney for the Central District of California,

Defendants.

Case No.: 2:25-cv-05605-MEMF-SP

**DECLARATION OF JOHN L. SCHWAB IN SUPPORT OF INTERVENORS' UNOPPOSED EX PARTE APPLICATION TO PARTICIPATE IN JULY 10 TRO HEARING**

[Filed Concurrently: *Ex Parte* Application; [Proposed] Order]

Judge: Hon. Maame Ewusi-Mensah Frimpong

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**DECLARATION OF JOHN L. SCHWAB**

I, John L. Schwab, hereby declare:

1. I am admitted to practice before all of the Federal and State courts in the State of California, including the United States District Court for the Central District of California. I am a partner in the law firm of Munger, Tolles & Olson LLP, counsel for Plaintiffs-Intervenors (“Intervenors”) the City of Los Angeles, the City of Culver City, the City of Montebello, the City of Monterey Park, the City of Pico Rivera, the City of Santa Monica, and the City of West Hollywood in the above-captioned matter. I submit this declaration in support of Intervenors’ Unopposed *Ex Parte* Application to Participate in the July 10 Hearing on Plaintiffs’ Applications for Temporary Restraining Orders. The contents of this declaration are based on my personal knowledge. If called as a witness, I could and would testify competently to the matters set forth in this declaration.

2. On July 7, 2025, I informed Daniel A. Beck, Ryan Case Chapman, and Sean Skedzielewski, counsel for Defendants, via email of the date and substance of Intervenors’ anticipated *Ex Parte* Application, asked if Defendants intended to oppose, and offered to meet and confer. On July 8, 2025, I and my colleagues Martin Estrada and Virginia Grace Davis met and conferred with Mr. Beck and Mr. Chapman regarding Intervenors’ *Ex Parte* Application. Following the meet and confer, Mr. Beck provided the following statement: “The Defendants do not oppose the ex parte request to participate in the July 10 TRO hearing. The Defendants support fair, open, and transparent resolution of the issues. As with all hearings, the Defendants believe the hearing should be conducted in a way that is based upon the pleadings on file, is not unduly repetitive, and gives fair voice to argument by the opposing sides.”

1           3.     I also conferred with Plaintiffs’ counsel on July 7 regarding the date  
2 and substance of this Application. Counsel for Plaintiffs confirmed that Plaintiffs  
3 do not oppose this Application.

4           I declare under penalty of perjury under the laws of the United States of  
5 America that the foregoing is true and correct.

6           Executed on this 8th day of July, 2025, at Los Angeles, California.

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/s/ John L. Schwab  
John L. Schwab

1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA

3 Pedro VASQUEZ PERDOMO; Carlos  
Alexander OSORTO; and Isaac  
4 VILLEGAS MOLINA; Jorge  
HERNANDEZ VIRAMONTES; Jason  
5 Brian GAVIDIA; LOS ANGELES  
WORKER CENTER NETWORK;  
6 UNITED FARM WORKERS;  
COALITION FOR HUMANE  
7 IMMIGRANT RIGHTS; IMMIGRANT  
DEFENDERS LAW CENTER,

8 Plaintiffs,

9 v.

10 Kristi NOEM, in her official capacity as  
Secretary, Department of Homeland  
11 Security; Todd M. LYONS, in his  
official capacity as Acting Director,  
12 U.S. Immigration and Customs  
Enforcement; Rodney S. SCOTT, in his  
13 official capacity as Commissioner, U.S.  
Customs and Border Patrol; Michael W.  
14 BANKS, in his official capacity as  
Chief of U.S. Border Patrol; Kash  
15 PATEL, in his official capacity as  
Director, Federal Bureau of  
16 Investigation; Pam BONDI, in her  
official capacity as U.S. Attorney  
17 General; Ernesto SANTACRUZ JR., in  
his official capacity as Acting Field  
18 Office Director for Los Angeles, U.S.  
Immigration and Customs Enforcement;  
19 Eddy WANG, Special Agent in Charge  
for Los Angeles, Homeland Security  
20 Investigations, U.S. Immigration and  
Customs Enforcement; Gregory K.  
21 BOVINO, in his official capacity as  
Chief Patrol Agent for El Centro Sector  
22 of the U.S. Border Patrol; Jeffrey D.  
STALNAKER, in his official capacity  
23 as Acting Chief Patrol Agent, San  
Diego Sector of the U.S. Border Patrol;  
24 Akil DAVIS, in his official capacity as  
Assistant Director in Charge, Los  
25 Angeles Office, Federal Bureau of  
Investigation; Bilal A. ESSAYLI, in his  
26 official capacity as U.S. Attorney for  
the Central District of California,

27 Defendants.  
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Case No.: 2:25-cv-05605-MEMF-SP

**[PROPOSED] ORDER GRANTING  
INTERVENORS' UNOPPOSED EX  
PARTE APPLICATION TO  
PARTICIPATE IN JULY 10 TRO  
HEARING**

Judge: Hon. Maame Ewusi-Mensah  
Frimpong

**[PROPOSED] ORDER**

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On July 8, 2025, Proposed Plaintiffs-Intervenors the City of Los Angeles, the County of Los Angeles, the City of Culver City, the City of Montebello, the City of Monterey Park, the City of Pasadena, the City of Pico Rivera, the City of Santa Monica, and the City of West Hollywood (collectively, “Intervenors”) filed an Unopposed *Ex Parte* Application to Participate in the July 10 Hearing on Plaintiffs’ Applications for Temporary Restraining Orders (the “July 10 TRO Hearing”). Intervenors request leave to participate in the July 10 TRO Hearing to protect their distinct interests in maintaining law and order and preserving crucial tax revenues in the face of Defendants’ recent immigration enforcement actions, interests that are squarely implicated by the TRO Applications that are the subject of the July 10 TRO Hearing.

In these circumstances, the Court has discretion to permit Intervenors to participate in the July 10 Hearing even if it has not yet ruled on Intervenors’ pending Motion to Intervene. *See, e.g., Spangler v. Pasadena City Bd. of Educ.*, 552 F.2d 1326, 1329 (9th Cir. 1977) (noting district court’s discretion to allow limited participation prior to formal intervention); *In re Vargas*, 723 F.2d 1461, 1464 (10th Cir. 1983) (proposed intervenor participated in district court proceedings, including hearing on motion to quash, while motion to intervene was pending); *Azevedo v. Northland Ins. Co.*, No. 3:05CV195-BES-RAM, 2006 WL 3782833, at \*4 (D. Nev. Dec. 22, 2006) (courts may “allow persons not a party to the litigation to participate at some stage of the proceedings” even absent “formal intervention”).

The Court, having considered Intervenors’ Unopposed *Ex Parte* Application and finding good cause therefor, hereby **GRANTS** the Unopposed *Ex Parte* Application and **ORDERS** that Intervenors shall be permitted to participate in the July 10 TRO Hearing.

1 **IT IS SO ORDERED.**

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3 Dated: \_\_\_\_\_

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MAAME EWUSI-MENSAH FRIMPONG  
United States District Judge

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