

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Eugene Trifonov v. Kristi Noem et al

Trifonov · No. 5:25-cv-03460-DOC-JDE · Decided January 6, 2026

SUMMARY

The United States District Court for the Central District of California granted a preliminary injunction in favor of Eugene Trifonov. The court incorporated its prior temporary restraining order analysis and required that any future enforcement actions after Trifonov’s release comply with specified procedures, including an opportunity to be heard if travel documents are provided.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	David O. Carter
JURISDICTION	United States District Court for the Central District of California
DECIDED	January 6, 2026
DOCKET	5:25-cv-03460-DOC-JDE
DISPOSITION	other
PROCEDURAL POSTURE	The court considered Petitioner's request for a preliminary injunction after previously granting an ex parte temporary restraining order.
STANDARD OF REVIEW	The standard for issuing a temporary restraining order is identical to the standard for issuing a preliminary injunction; the court applied the Winter factors.
PRECEDENTIAL VALUE	Unknown; district-court civil minutes order.

TOPICS

- injunctions
- immigration detention
- removal proceedings
- civil procedure

PRACTICE AREAS

- immigration
- civil procedure
- equitable relief

QUESTIONS PRESENTED

1. Whether Petitioner was entitled to a preliminary injunction under the Winter factors.

2. What procedural restraint should govern any future enforcement actions after Petitioner's release.

HOLDINGS

1. A preliminary injunction should issue because Petitioner made a sufficient showing under each of the Winter factors, and the court found no reason to depart from its prior TRO analysis.
2. Any future enforcement actions after Petitioner's release must comply with the required procedures identified in the TRO, and Petitioner must be given an opportunity to be heard if travel documents are provided.

KEY QUOTATIONS

“The standard for issuing a temporary restraining order is identical to the standard for issuing a preliminary injunction.” (at 1)

“Accordingly, this Court GRANTS A PRELIMINARY INJUNCTION with the same restraint as in the TRO: “[A]ny future enforcement actions after [Petitioner’s] release must comply with the required procedures.”” (at 1)

FACTUAL BACKGROUND

The case concerns anticipated future enforcement actions following Petitioner's release, including possible removal proceedings. The court noted that the absence of travel documents suggested Petitioner was not going to be imminently removed. The injunction requires any future enforcement actions after Petitioner's release to comply with required procedures, including an opportunity for Petitioner to be heard if travel documents are provided.

PROCEDURAL HISTORY

On December 22, 2025, the court granted Petitioner's ex parte application for a temporary restraining order and set a preliminary-injunction hearing. Respondents filed an opposition, Petitioner filed a reply, and the court held oral argument on January 5, 2026. The court then entered a preliminary injunction with the same restraint imposed by the TRO.

DISPOSITION

other

CASES CITED

- Lockheed Missile & Space Co. v. Hughes Aircraft Co., 887 F. Supp. 1320, 1323 (N.D. Cal. 1995)
- Winter v. Nat. Res. Def. Council, Inc., 555 U.S. 7, 22 (2008)
- Hoac v. Becerra, No. 2:25-cv-01740-DC-JDP, 2025 WL 1993771, at *4 (E.D. Cal. July 16, 2025)

OPINION

Eugene Trifonov v. Kristi Noem et al

PER CURIAM.

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES – GENERAL

Case No. 5:25-cv-03460-DOC-JDE Date: January 6, 2026 Title: Eugene Trifonov v. Kristi Noem et al PRESENT:

THE HONORABLE DAVID O. CARTER, JUDGE

Karlen Dubon Not Present Courtroom Clerk Court Reporter

ATTORNEYS PRESENT FOR ATTORNEYS PRESENT FOR

PLAINTIFF: DEFENDANTS: None Present None Present

PROCEEDINGS (IN CHAMBERS): ORDER ENTERING

PRELIMINARY INJUNCTION

On December 22, 2025 this Court issued an Order Granting Petitioner’s Ex Parte Application for a Temporary Restraining Order (the “TRO”) (Dkt. 4) and set a hearing on a preliminary injunction for January 5, 2026. Respondents filed a response as to why a preliminary injunction should not issue on December 29, 2025 (Dkt. 6), and Petitioner filed his Reply on December 31, 2025 (Dkt. 8). Oral argument on the preliminary injunction was held on January 5, 2026. “The standard for issuing a temporary restraining order is identical to the standard for issuing a preliminary injunction.” *Lockheed Missile & Space Co. v. Hughes Aircraft Co.*, 887 F. Supp. 1320, 1323 (N.D. Cal. 1995). In issuing the TRO, the Court found that Petitioner made a sufficient showing under each of the Winter factors. See generally TRO; see *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 22 (2008). The Court sees no reason to depart from its previous analysis and incorporates that analysis herein. Accordingly, this Court GRANTS A PRELIMINARY INJUNCTION with the same restraint as in the TRO: “[A]ny future enforcement actions after [Petitioner’s] release must comply with the required procedures.” TRO at 7. The Court outlined the

CIVIL MINUTES – GENERAL

Case No. 5:25-cv-03460-DOC-JDE Date: January 6, 2026 Page 2 most pertinent of these procedures in its TRO. See *id.* at 3-8. For purposes of clarification, as this Court previously noted, “the absence of any travel documents suggests that Petitioner [is] not going to be imminently removed.” TRO at 5-6 (citing *Hoac v. Becerra*, No. 2:25-cv-01740-DC-JDP, 2025 WL 1993771, at *4 (E.D. Cal. July 16, 2025)). And of course, Petitioner must be given an opportunity to be heard according to procedures if such a travel document is provided. The Clerk shall serve this minute order on the parties. MINUTES FORM 11 Initials of Deputy Clerk: kdu

CIVIL-GEN