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9 *(Victimology Clinic for the Analysis of Human Rights Violations) of the University of*
10 *Guadalajara*

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IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION – RIVERSIDE

L.T., SEVAK MESROBIAN, JOSE
MAURO SALAZAR GARZA, AND J.M.

on behalf of themselves and all others
similarly situated; COALITION FOR
HUMANE IMMIGRANT RIGHTS,

Plaintiffs,

v.

U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT; TODD M. LYONS,
Acting Director, U.S. Immigration and
Customs Enforcement; JAIME RIOS,
Acting Director of Los Angeles Field
Office, Enforcement and Removal
Operations, U.S. Immigration and Customs
Enforcement; U.S. DEPARTMENT OF
HOMELAND SECURITY; KRISTI
NOEM, Secretary, U.S. Department of
Homeland Security,

Defendants.

CASE NO. 5:26-cv-00322-SSS-RAO

**MOTION FOR LEAVE TO FILE
BRIEF OF AMICUS CURIAE IN
SUPPORT OF PLAINTIFFS’
MOTION FOR PRELIMINARY
INJUNCTION**

Date: April 28, 2026
Time: 10:00 a.m.
Judge: Hon. Sunshine Sykes

1 *Clínica Victimológica de Análisis a Violaciones a Derechos Humanos*
2 (Victimology Clinic for the Analysis of Human Rights Violations) of the University of
3 Guadalajara (“University of Guadalajara”), a public university based in Guadalajara,
4 Mexico, by and through undersigned counsel, moves for leave to appear as Amicus
5 Curiae and file the proposed brief, attached hereto as Exhibit 1, in support of Plaintiffs’
6 Motion for Preliminary Injunction, Dkt. 34. Plaintiffs indicated that they do not oppose
7 this request. Defendants did not reply to counsel’s inquiry about this filing.

8 **ARGUMENT**

9 **I. Standard for Motion for Leave to Appear as Amicus Curiae**

10 District courts have broad discretion to permit participation by amici curiae. See
11 *Hoptowit v. Ray*, 682 F.2d 1237, 1260 (9th Cir. 1982). An amicus brief is appropriate
12 where the amicus offers a perspective that is useful to the Court and not fully developed
13 by the parties. See *In re Roxford Foods Litig*, 790 F. Supp. 987, 997 (E.D. Cal. 1991).
14 Amicus participation is particularly appropriate in cases involving requests for
15 injunctive relief, where courts must consider the broader public interest beyond the
16 immediate parties. See *Bernhardt v. Los Angeles County*, 339 F.3d 920, 931–32 (9th
17 Cir. 2003). Courts have recognized that amicus briefs are especially valuable where the
18 issues presented carry implications for non-parties and the public at large. See *Earth*
19 *Island Inst. v. Nash*, No. 1:19-cv-01420-DAD-SAB, 2019 WL 6790682, at *4 (E.D.
20 Cal. Dec. 12, 2019). Moreover, courts generally favor permitting amicus participation
21 where the proposed submission is helpful and offers a perspective not fully developed
22 by the parties. See *Neonatology Assocs., P.A. v. C.I.R.*, 293 F.3d 128, 133 (3d Cir. 2002).

23 **II. Interest and Identity of Amicus Curiae**

24 Amicus Curiae has a strong interest in this litigation. This case presents urgent
25 and life-threatening conditions of civil immigration detention at the Adelanto ICE
26 Processing Center (Adelanto), including allegations of systemic denial of medical care,
27 exposure to unsafe and unsanitary conditions, and recent death in custody.

1 *Clínica Victimológica de Análisis a Violaciones a Derechos Humanos*, is an
2 academic and research-based legal clinic, within the Doctoral Program in Human
3 Rights at the University of Guadalajara. The Clinic is dedicated to the analysis,
4 documentation, and legal interpretation of serious human rights violations, with a
5 particular focus on structural violence, state responsibility in custodial contexts, and
6 access to justice for vulnerable populations. The Clinic has participated in strategic
7 human rights litigation at the international level, including the preparation of amicus
8 curiae briefs before the inter-American human rights system in cases addressing state
9 responsibility for harm in custody. Dr. Lucero Moreno Murguía, coordinator of the
10 Clinic, is a legal scholar specializing in human rights, victimology, and structural
11 violence, with experience in the inter-American human rights system and academic
12 research focused on custodial harm, dignity, and state obligations.

13 While existing submissions, including those of governmental entities, provide
14 important factual and policy perspectives, the proposed amicus brief provides a distinct
15 and highly specialized analytical framework grounded in inter-American human rights
16 law, international legal standards, and victimological analysis of structural violence in
17 custodial settings like Adelanto. This perspective is not presented by the parties and is
18 directly relevant to the Court’s assessment of whether the challenged conditions
19 constitute impermissible punishment and deliberate indifference under the
20 Constitution. Given the gravity and urgency of the issues presented, Amicus Curiae
21 respectfully submits that its participation will assist the Court in evaluating the full
22 legal and human implications of the conditions at issue.

23 Amicus Curiae further demonstrates that the conditions alleged, including denial
24 of medical care, exposure to unsanitary environments, and coercive practices, are not
25 isolated incidents but manifestations of structural deficiencies that produce foreseeable
26 and preventable harm. Through detailed comparative matrices and legal analysis,
27 Amicus Curiae establishes a direct correspondence between U.S. constitutional
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1 standards, such as deliberate indifference and impermissible punishment in civil
2 detention, and international legal classifications of cruel, inhumane, or degrading
3 treatment, and, in certain circumstances, torture by omission. This analytical
4 framework provides the Court with a structured and comparative tool to evaluate the
5 severity, systemic nature, and legal implications of the conditions at issue.

6 **III. Good Cause**

7 Good cause exists to permit the filing of the proposed amicus brief as this matter
8 is set for hearing on Plaintiffs’ Motion for Preliminary Injunction on April 28, 2026. In
9 addition, recent developments, including a reported death in custody and ongoing
10 allegations of serious and preventable harm within the Adelanto detention facility, have
11 significantly heightened the urgency and gravity of the issues before the Court. These
12 developments underscore the necessity of providing a comprehensive analytical
13 framework, including international human rights standards and victimological analysis,
14 to assist the Court in evaluating whether immediate injunctive relief is warranted.

15 Given the evolving factual context and the potential for irreparable harm,
16 permitting the filing of this amicus brief will assist the Court without prejudicing any
17 party. Denial of this Motion would deprive the Court of the opportunity to consider a
18 distinct and highly specialized legal framework that is not otherwise presented in the
19 existing briefing.

20 Moreover, allowing the filing of the proposed amicus brief will not prejudice any
21 party, as it introduces no new claims or evidence and merely supplements the legal
22 analysis already before the Court. The Court’s consideration of the proposed amicus
23 brief is particularly appropriate in light of the imminent determination on Plaintiffs’
24 Motion for Preliminary Injunction, where a fully informed legal analysis is essential.
25 Accordingly, the balance of considerations strongly favors granting this Motion.
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CONCLUSION

For the foregoing reasons, the University of Guadalajara, by and through undersigned counsel, respectfully requests this Honorable Court’s leave to appear as Amicus Curiae and deem the proposed attached amicus brief filed.

Dated: April 20th 2026

Respectfully submitted,

/s/ Salomon Zavala
Salomon Zavala

Attorney for *Clinica Victimológica de Análisis a Violaciones a Derechos Humanos* (Victimology Clinic for the Analysis of Human Rights Violations) of the University of Guadalajara

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CERTIFICATE OF SERVICE

I hereby certify that on April 20th, 2026, I caused the above document and its attachments to be electronically filed with the Clerk of Court using CM/ECF, which will send electronic notification of such filing to all registered counsel.

/s/ Salomon Zavala
Salomon Zavala