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TODD LYONS Acting Director, Immigration and Customs Enforcement; ERNESTO SANTACRUZ, JR., Los Angeles Field Office, Acting Director, Immigration and Customs Enforcement, Enforcement and Removal Operations,

Respondents-Defendants.

Hearing Date: July 10, 2025 Hearing Time: 10:00 a.m. Ctrm: 10D

Honorable Fred W. Slaughter United States District Judge

Respondents Todd M. Lyons, in his official capacity as the Acting Director of U.S. Immigration and Customs Enforcement ("ICE"), and Ernesto M. Santacruz, Jr., in his official capacity as the Acting Director of ICE's Los Angeles Field Office, Enforcement and Removal Operations ("Respondents"), respectfully respond to the Order to Show Cause ("OSC") that the Court issued on June 18, 2025. Dkt. 17. The Court directed Respondents to show cause by June 26, 2025, "why they should not be restrained and enjoined pending trial of this action from removing Petitioner [Leonel Navarrete Hernandez] from the United States without a final order of removal, and why they should not be restrained and enjoined pending trial of this action from redetaining Petitioner absent further changed circumstances or a pre-deprivation hearing." Id.

Respondents agree not to remove Petitioner from the United States without a final order of removal and will not redetain Petitioner absent further changed circumstances or a pre-deprivation hearing. Respondents respectfully request that the Court discharge the OSC.

Respectfully submitted,

Dated: June 26, 2025 BILAL A. ESSAYLI United States Attorney DAVID M. HARRIS

Assistant United States Attorney

Chief, Civil Division JOANNE S. OSINOFF

Assistant United States Attorney Chief, Complex and Defensive Litigation Section

/s/ Randy Hsieh

RANDY HSIEH

Assistant United States Attorney

Attorneys for Federal Defendants-Respondents Todd M. Lyons and Ernesto M. Santacruz, Jr.

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