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9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 JULIO LLANES TELLEZ,

13 Case No.: 25-cv-08982(PCP)

14 Petitioner/Plaintiff,

15 vs.

16 **RESPONSE TO STATEMENT OF RECENT**
17 **DECISION (DKT.9)**

18 ORESTES CRUZ, Acting Field Office
19 Director of the San Francisco Immigration and
20 Customs Enforcement Office; TODD LYONS,
21 Acting Director of United States Immigration
22 and Customs Enforcement; KRISTI NOEM,
23 Secretary of the United States Department
24 of Homeland Security, PAMELA BONDI,
25 Attorney General of the United States, acting
in their official capacities,

Respondent/Defendant

26 Counsel for Petitioner JULIO LLANES TELLEZ has reviewed the docket in the case of
27 *Carlos Alberto Jimenez-Quezadas v. Polly Kaiser, et al.*, No. 25-10017-RFL (N.D. Cal.,
28 November 25, 2025) cited by the government. In that case, the Petitioner attempted to escape
from custody after ICE detention, there is no such allegation made here against Mr. Tellez.
Nothing in the record indicates that Mr. Tellez is a flight risk.

27 **RESPONSE TO STATEMENT OF RECENT**
28 **DECISION (DKT.9)**

1 Dated: December 2, 2025

2 By: */s/ Julio J. Ramos for Petitioner*

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27 RESPONSE TO STATEMENT OF RECENT
28 DECISION (DKT.9)