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Attorneys for Petitioner JULIO LLANES TELLEZ

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JULIO LLANES TELLEZ,

Petitioner/Plaintiff,

vs.

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

Respondent/Defendant

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

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

Counsel for Petitioner JULIO LLANES TELLEZ has reviewed the docket in the case of *Carlos Alberto Jimenez-Quezadas v. Polly Kaiser, et al.*, No. 25-10017-RFL (N.D. Cal., 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.

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RESPONSE TO STATEMENT OF RECENT
DECISION (DKT.9)

1 Dated: December 2, 2025

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

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