

1 BILAL A. ESSAYLI
First Assistant United States Attorney
2 DAVID M. HARRIS
Assistant United States Attorney
3 Chief, Civil Division
DANIEL A. BECK (Cal. Bar no. 204496)
4 Assistant United States Attorney
Chief, Complex and Defensive Litigation Section
5 Federal Building, Suite 7516
300 North Los Angeles Street
6 Los Angeles, California 90012
Telephone: (213) 894-2574
7 E-mail: Daniel.Beck@usdoj.gov

8 Attorneys for Federal Respondents

9 UNITED STATES DISTRICT COURT
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA
11

12 BEATRIZ A. FLORES MOTA,

13 Petitioner,

14 v.

15 JAMES JANCECKA, Warden of the
16 Adelanto Detention Center, *et al*,

17 Respondents.
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No. 5:25-cv-03068-MWC-AJR

**FEDERAL RESPONDENTS'
RESPONSE TO ORDER GRANTING
TEMPORARY RESTRAINING ORDER**

1 Petitioner Beatriz A. Flores Mota, a citizen of Mexico, filed a Petition for Writ of
2 Habeas Corpus [[Dkt. 1](#)] challenging her detention for purposes of enforcing a final
3 removal order. Petitioner also filed the same document as a docket entry entitled an *ex*
4 *parte* application for a Temporary Restraining Order [[Dkt. 2](#)].

5 On November 19, 2025, the Court issued an order granting a TRO [[Dkt. 6](#)] and
6 requiring that Petitioner be provided a bond hearing within seven days or be released.
7 The Court's order also set a preliminary injunction hearing for December 3, 2025, and
8 set a briefing schedule that required Petitioner to file an opening preliminary injunction
9 brief and all related submissions by the end of the day on November 25, 2025. *Id.*

10 As shown by the Order of the Immigration Judge attached as Exhibit A hereto, on
11 November 25, 2025 Petitioner received a bond hearing before the Immigration Judge,
12 who ordered Petitioner released from custody on bond.

13 Having been ordered released on bond, Petitioner did not file preliminary injunction
14 papers on November 25, 2025, as the ECF docket for this case reflects.

15 Providing the Petitioner with the § 1226(a) bond hearing, or otherwise releasing
16 them from detention, moots the preliminary injunction and this habeas petition more
17 generally. *See, e.g., Javier Gonzales et al. v. Kristi Noem et al.*, 5:25-cv-02054-ODW-
18 BFM, [Dkt. no. 16](#) (August 25, 2025 minute order by Hon. Judge Wright, denying as
19 moot the petitioners' pending request for a preliminary injunction given their receipt
20 pursuant to a TRO of 1226(a) bond hearings and issuing the petitioners an order to show
21 cause re: dismissal); [Dkt. no. 17](#) (notice of voluntary dismissal); and [Dkt. no. 18](#) (order
22 dismissing petition). *See also Moises Salomon Zaragoza Mosqueda v. Kristi Noem et al.*,
23 5:25-cv-002304-CAS-BFM, [Dkt. no. 15](#) (September 17, 2025 minute order by Hon.
24 Judge Snyder, denying preliminary injunction and issuing OSC re dismissal for
25 mootness given the petitioners' receipt of immigration bond hearings); [Dkt. no. 16](#)
26 (notice of voluntary dismissal); *Coc Tut v. Kristi Noem*, 5:25-cv-02701-DOC (October
27 30, 2025 order denying preliminary injunction as moot and issuing OSC re: dismissal
28 where bond hearings were provided to detainees pursuant to TRO).

Accordingly, the preliminary injunction hearing scheduled for December 3, 2025 should be taken off calendar, and the Petitioner should either voluntarily dismiss their Petition or else be required to respond to an OSC re: Dismissal.

Dated: December 1, 2025

Respectfully submitted,

BILAL A. ESSAYLI
First Assistant United States Attorney
DAVID M. HARRIS
Assistant United States Attorney
Chief, Civil Division
DANIEL A. BECK
Assistant United States Attorney
Chief, Complex and Defensive Litigation Section

/s/ Daniel A. Beck
DANIEL A. BECK
Assistant United States Attorney

Attorneys for Federal Respondents

CERTIFICATE OF COMPLIANCE WITH L.R. 11-6.2

The undersigned, counsel of record for Respondent, certifies that the memorandum of points and authorities contains 380 words, which complies with the word limit of L.R. 11-6.1.

Dated: December 1, 2025

/s/ Daniel A. Beck
DANIEL A. BECK
Assistant United States Attorney
Attorneys for Federal Respondents