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7 **UNITED STATES DISTRICT COURT**  
8 **SOUTHERN DISTRICT OF CALIFORNIA**  
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10 BEATRIZ URIBE TREJO,  
11 Petitioner,  
12 v.  
13 CHRISTOPHER LAROSE; et al.,  
14 Respondents.  
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Case No.: 25-cv-3253-JES-DDL  
**STATUS REPORT**

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18 Pursuant to the Court’s December 3, 2025 order, ECF No. 10, Petitioner provides  
19 this status report conveying that at the present time, none of the sought relief has been  
20 answered. Despite literally ten to twenty hours of phone calls, emails, and in-person  
21 attempts, none of the relief sought in this petition has been obtained, The ability to seek  
22 relief through the immigration court seems an unending maze which continues to lead  
23 back to further irreparable harm and Constitutional violations such that the present  
24 Court’s lawful jurisdiction over the matter is needed.

25 At the bond hearing on December 4, 2025 at 8:00AM it was agreed at the hearing  
26 that the Petitioner would pay bond despite the unlawful arrest and detention in order to  
27 end her unlawful detention and reunite her with her family. Counsel argued that  
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1 Petitioner should not be subject to Alternative to Detention Alternatives including, but  
2 not limited to ICE check ins, ISAP monitoring, which, according to the Immigration  
3 Court, necessitated a higher bond amount. Counsel reluctantly paid the higher bond, by  
4 wire transfer, at 10:00am on December 4, 2025 as soon as ICE posted the amount.  
5 Despite the agreement to pay a higher bond in order to not be subjected to such  
6 infringements, currently, ICE does not seem to intend to follow the Immigration Judge's  
7 order. In the online bond, it states that Petitioner is subject to ATD at DHS discretion.  
8 *See* Exhibit 2. Counsel has presently attempted to resolve the issue of both remaining in  
9 detention and the potential that ICE will violate the Judge's order that Ms. Uribe Trejo  
10 should not be subject to Alternatives to Detention. Additionally, Counsel on behalf of  
11 Petitioner, reached out to ICE and OPLA at Otay Mesa in order to resolve the issues, to  
12 no avail. *See* Exhibit 3. It should be concerning to the present Court that it is being  
13 suggested that although the immigration judge ordered no ATD, ICE is again overruling  
14 judicial authority and acting well outside the authority vested with it and again violating  
15 its own rule under the APA.

16 Both the release and Ms. Uribe Trejo's further deprivation which would be  
17 imposed by ICE's Alternative to Detention were part of Petitioner's Prayer for Relief to  
18 this Court. To date, these prayers are unanswered through the immigration system.  
19 Please note that Counsel is currently writing the status update at 8:30PM on December  
20 5, 2025. So after a bond hearing and payment made, a further harm, the Petitioner *is*  
21 *still not even out of custody- the most basic request from an unlawful arrest and*  
22 *detention.* This is after endless hours of calls to every ICE listed phone number and  
23 emails available, turning over each and every resource available. The gross violations  
24 continue to show why this matter must be adjudicated with the present Court. What  
25 about the next Petitioner with less resources available- should our Constitution and laws  
26 be set aside for one agency's aims? It is clear that ICE continues to work with impunity  
27 and in violation of the Constitution and its own rules. We respectfully ask for the  
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**CERTIFICATE OF SERVICE**

I, Caroline Matthews, CERTIFY

I am over the age of 18 and not a party to this matter. My business address is 120 Stevens Avenue, Solana Beach, CA 92075. On December 5, 2025, I served a copy of this by email to the following individuals:

Janet A. Cabral, Assistant U.S. Attorney  
Chief, Civil Division  
Southern District of California  
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/s/Caroline G. Matthews  
Caroline G. Matthews, Esq.  
Pro Bono Counsel for Respondent