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8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**
10 **FRESNO DIVISION**

11
12 JOSE OSVALDO FERREIRA JUNIOR

13 *Petitioner,*

14
15 v.

16 Timothy S. ROBBINS, Field Office Director of the
17 Los Angeles Field Office of U.S. Immigration and
Customs enforcement; Todd M. LYONS, Acting
18 Director of U.S. Immigration and Customs
Enforcement; U.S. DEPARTMENT OF HOMELAND
19 SECURITY, Kristi NOEM, Secretary of the U.S.
Department of Homeland Security, Christopher
20 CHESTNUT, Warden, California City Corrections
Center, and Pamela BONDI, Attorney General of the
21 United States
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23 *Respondents,*

Case No. 1:25-CV-01671-DC-DMC

**REPLY IN SUPPORT OF MOTION FOR
TEMPORARY RESTRAINING ORDER**

Note on Motion Calendar:

REPLY

In its minute order of December 1, 2025, the Court ordered Respondents to file an Opposition or Statement of Non-Opposition to Petitioner's Motion for Temporary Restraining order on or before December 4, 2025. As of today, no Opposition has been filed in the present matter. For the reasons set forth in Petitioner's Petition for Writ of Habeas Corpus (Dkt. 1); Petitioner's Motion For a Temporary Restraining Order (Dkt. 2), Petitioner believes this Court should issue a Temporary Restraining Order. Petitioner hereby submits on his pleadings

Respectfully submitted,

DATE: 12/04/2025

/S/ Jose F. Vergara

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COUNSEL FOR PETITIONER