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6 UNITED STATES DISTRICT COURT
7 EASTERN DISTRICT OF CALIFORNIA
8 FRESNO DIVISION

9 Cristian Amaya-Quinteros,
10
11 Petitioner,

Case Number: 1:25-cv-1672-AC

12 v.

**PETITIONER'S OPPOSITION TO
RESPONDENT'S MOTION TO STAY.**

13 CORECIVIC, INC., a Maryland corporation;
14 Kristi NOEM, Secretary of the Department of
15 Homeland Security; Pamela BONDI, U.S.
16 Attorney General; in their official capacity;
17 Moises BECERRA, in his official capacity as
18 Field Office Director of Immigration and
19 Customs Enforcement, Enforcement and
20 Removal Operations.

21 Respondents.

22 Petitioner respectfully opposes Respondents' motion for a stay (ECF No. 32). Petitioner
23 is aware of the pending Ninth Circuit case, *Rodriguez Vazquez v. Bostock*, No. 25-6842 (9th
24 Cir.), which may address distinctions between individuals detained under 8 U.S.C. § 1225 and
25 those detained under 8 U.S.C. § 1226. Specifically, the Ninth Circuit may consider whether
26 individuals apprehended within the United States are entitled to bond hearings or must remain in
27 mandatory detention as applicants for admission. That appeal arises from *Rodriguez Vazquez v.*
28 *Bostock*, 3:25-cv-05240-TMC (W.D. Wash. 2025).

CERTIFICATE OF SERVICE

I, Mario Salgado, am over the age of 18 years and maintain a business address located at 605 Market Street Suite 1111 in San Francisco, California 94105. I electronically served the **Petitioner's Opposition to Respondent's Motion to Stay** to the United States Attorney's Office for the Eastern District of California; 2500 Tulare Street, Suite 4401, Fresno, CA 93721. via the court's filing system.

I swear under penalty of perjury under the laws of the United States of America that the foregoing is true and correct:

Date: January 16, 2026

/s/ Mario Salgado
Mario Salgado, Esq.