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9 IN THE UNITED STATES DISTRICT COURT  
10 FOR THE EASTERN DISTRICT OF CALIFORNIA  
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12 J.E.H.G.,  
13  
14 v. Petitioner,  
15 CHRISTOPHER CHESTNUT, ET AL.,  
16 Respondents.  
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CASE NO. 1:25-CV-01673-JLT-SKO (HC)  
**RESPONSE TO ORDER TO SHOW CAUSE;  
REQUEST FOR EXTENSION**

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19 Respondents hereby respond to the Court's order to show cause. ECF No. 13. Respondents  
20 respectfully request an extension of seven (7) days to provide the records ordered by the Court. Good  
21 cause exists for an extension as follows based on information provided by ICE:

22 At the time of Deportation Officer Cruz's December 4, 2025 declaration, the only information  
23 available to DO Cruz was the Petitioner's Form I-213, which he attached to his declaration. The  
24 Petitioner's A-File was in the physical custody of USCIS, and ICE-OPLA has requested that Petitioner's  
25 A-File be returned to ICE-OPLA. As of this writing, the A-File has not been returned to ICE-OPLA.

26 Moreover, with respect to the details of the petitioner's violations of the Intensive Supervision  
27 Appearance Program, DO Cruz relied upon the information from the Petitioner's Form I-213 (which  
28 was not prepared by DO Cruz, but is attached to his declaration) and is trying to determine whether there

1 are any documents supporting the missed violations that are documented in the Form I-213.

2 Further, for the same reasons, further order or monetary sanctions should not be issued.

3 Dated: December 8, 2025

ERIC GRANT  
United States Attorney

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5 By: /s/ Brendon L.S. Hansen  
6 Brendon L.S. Hansen  
7 Assistant United States Attorney  
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