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7 *Pro Bono Counsel for Petitioner*

8 **UNITED STATES DISTRICT COURT**  
9 **EASTERN DISTRICT OF CALIFORNIA**

10  
11 Carlos Jesus Colina-Meira  
12 Petitioner,

13 v.

14 Todd Lyons, Acting Director, Immigration  
15 Customs and Enforcement; and  
16 Christopher Chestnut, Warden, California  
17 City Correctional Facility

18 Respondents.

Case No. 1:25-cv-01716-CSK

**PETITIONER'S SUR-REPLY IN  
SUPPORT OF HIS HABEAS  
PETITION**

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1 Petitioner Carlos Jesus Colina-Meira (“Petitioner” or “Colina-Meira”)  
2 submits the following Sur-Reply in support of his Habeas Petition (“Reply”) and in  
3 accordance with this Court’s Minute Order permitting the same. (Dkt. 14).

4 Respondents’ Supplemental Response (Dkt. 15) attached various documents,  
5 most of which were previously filed with Respondents’ Opposition Brief. Notably,  
6 both Exhibit 13 and 14 to Respondents’ Supplemental Response (Dkt. 15) note that  
7 Petitioner was previously released on parole in October 2022.

8 As noted in Petitioner’s Reply (Dkt. 13), case law is clear that “[w]here the  
9 release decision was made by a DHS officer, not an immigration judge, the  
10 Government’s practice has been to require a showing of changed circumstances  
11 before re-arrest.” *Aceros v. Kaiser*, No. 25-cv-06924-EMC, 2025 U.S. Dist.  
12 LEXIS 179594 at \*1 (N.D. Cal. Sept. 12, 2025) (citing *Seravia v. Sessions*, 280 F.  
13 Supp. 3d 1168, 1197 (N.D. Cal. 2017)).

14 See also *Josue I.C.V. v. Lyons et al.* 1:25-cv-01542-SKO (E.D. Cal Dec. 5,  
15 2025) (granting habeas petition and ordering Petitioner’s release and finding that  
16 Petitioner’s re-detention without a pre-deprivation hearing was a violation of the  
17 Due Process Clause of the Fifth Amendment).

18 Petitioner respectfully asks the Court to grant Petitioner’s Habeas Petition  
19 and order Petitioner’s release.

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23 DATED: December 30, 2025

VENABLE LLP

24 By: /s/ Sarah S. Brooks

25 Sarah S. Brooks

26 Pro Bono Counsel for Carlos Jesus Colina-  
27 Meira  
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