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13 UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF CALIFORNIA

15 ESTEBAN QUIROGA-CHAPARRO,


16 Petitioner,

17 v.

18 WARDEN OF THE GOLDEN STATE ANNEX
19 DETENTION FACILITY, ET AL.,

20 Respondents.

Case No. 1:25-cv-01731-AC

Agency No. 

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

21 The Court ordered Respondents to distinguish this case from those where the Court rejected the
22 exact argument Respondents lodge here, and Respondents concede they cannot. *See* ECF No. 11
23 (December 29, 2025 Order); ECF No. 12 (Opposition) at 2 (acknowledging that “the legal arguments
24 advanced in [the] briefing are substantially the same as those advanced in previous cases before this
25 Court”); *see also id.* at 1 (“Petitioner’s claims largely align with those of earlier cases.”). Failing in any way
26 to distinguish these facts, and failing to provide any evidence justifying Petitioner’s re-arrest and ongoing
27 detention, Respondents regurgitate the same boilerplate legal arguments that this Court (among countless
28 others) has repeatedly rejected. *See Amaya-Quinteros v. CoreCivic*, 1:25-cv-1672-AC, 2025 WL 3687642
(E.D. Cal. Dec. 19, 2025); *Tenorio Rugama v. Chestnut*, 1:25-cv-1918-AC, 2025 WL 3707234 (E.D. Cal.
Dec. 22, 2025); *see, e.g., Lepe v. Andrews*, No. 1:25-CV-01163-KES-SKO (HC), 2025 WL 2716910 (E.D.


1 Cal. Sept. 23, 2025); *Camacho v. Hollinshead*, No. 1:25-CV-00593-BLW, 2025 WL 3228998 (D. Idaho
2 Nov. 19, 2025); *Rosado v. Figueroa*, No. CV 25-02157, 2025 WL 2337099 (D. Ariz. Aug. 11, 2025), *report*
3 *and recommendation adopted*, 2025 WL 2349133 (D. Ariz. Aug. 13, 2025); *Gunaydin v. Trump*, 784 F.
4 Supp. 3d 1175 (D. Minn. 2025).

5 Accordingly, the Court should take the same approach here as in *Amaya-Quinteros*, 2025 WL
6 3687642, and *Tenorio Rugama*, 2025 WL 3707234, and order Petitioner's immediate release from
7 Respondents' custody.

8 For the foregoing reasons, as well as those set forth in ECF No. 10 (Reply), Petitioner respectfully
9 requests that the Court grant his Petition for Writ of Habeas Corpus (ECF No. 1) and his Motion for
10 Temporary Restraining Order (ECF No. 9) and order his immediate release from detention.

11
12 Dated: December 30, 2025

Respectfully submitted,

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14 By: 

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