

1 Wilson M. Dunlavey (SBN 307719)  
2 Celena H. Nelson (SBN 356840)  
3 Nicole M. Rubin (SBN 361232)  
4 **LIEFF CABRASER HEIMANN & BERNSTEIN, LLP**  
5 275 Battery Street, 29th Floor  
6 San Francisco, CA 94111-3339  
7 Telephone: 415.956.1000  
8 Facsimile: 415.956.1008  
9 wdunlavey@lchb.com  
10 chnelson@lchb.com  
11 nrubin@lchb.com

12 *Attorneys for Petitioner*


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-1731-AC

Agency No. 

**PETITIONER'S RESPONSE TO  
COURT'S ORDER TO SHOW CAUSE**

21 On December 31, 2025, the Court ordered Petitioner's immediate release from Respondents'  
22 custody. The Court also ordered Respondents to 1) "[w]ithin three days of the date of this order...file a  
23 status report confirming petitioners release" and 2) show cause "by no later than 1/5/2026 as to why this  
24 court should not issue a preliminary injunction on the same terms as this order." ECF No. 14. Respondents  
25 have done neither. Thus, Petitioner respectfully requests that the Court issue a Preliminary Injunction on the  
26 same terms as its December 31, 2025 Order ("Order").<sup>1</sup>

27 Petitioner confirms that he was released from custody on the evening of December 31, 2025. After  
28 the Court entered its Order, Counsel for Petitioner promptly transmitted it to the relevant officials at the  
Golden State Annex, where Petitioner was being held, and he was released later that evening. ICE officials

<sup>1</sup> The Court also permitted Petitioner to file a response by January 7, 2026.

1 notified Petitioner's Counsel of his release and told Counsel that Petitioner was to report to the ICE  
2 Enforcement and Removal Field Office in San Francisco on January 7, 2026 at 10:00 am. Petitioner did so,  
3 accompanied by Counsel and his husband, though his husband was required to remain outside.

4 After waiting several hours at the Field Office, Petitioner was directed by ICE to sign documents  
5 outlining the terms of his parole. The documents were exclusively provided in English, and Counsel was not  
6 permitted to review the documents until after Petitioner signed them. On information and belief, Petitioner  
7 is subject to the same conditions of release to which he was subject prior to his October 2025 detention.

8 Roughly two hours thereafter, a contractor provided oral instructions regarding the SmartLINK app.  
9 Counsel was not permitted to be present for the instructions. Counsel requested written instructions and an  
10 ICE official stated that the instructions were only provided orally and in the app. The written instructions in  
11 the app are only provided in English.

12 Petitioner was instructed to report to the ICE Enforcement and Removal Field Office in San  
13 Francisco on July 8, 2026 at 8:00 am. Petitioner intends to comply.

14 For the foregoing reasons, as well as those set forth in ECF No. 9 (Motion for Temporary  
15 Restraining Order) and ECF No. 10 (Reply), Petitioner respectfully requests that the Court issue a  
16 preliminary injunction on the same terms as the December 31 Order.

17 Dated: January 8, 2026

Respectfully submitted,

18  
19  
20 By: /s/ Celena H. Nelson

21 Wilson M. Dunlavey (SBN 307719)  
22 Celena H. Nelson (SBN 356840)  
23 Nicole M. Rubin (SBN 361232)  
24 **LIEFF CABRASER HEIMANN & BERNSTEIN, LLP**  
25 275 Battery Street, 29th Floor  
26 San Francisco, CA 94111-3339  
27 Telephone: 415.956.1000  
28 Facsimile: 415.956.1008  
wdunlavey@lchb.com  
chnelson@lchb.com  
nrubin@lchb.com

*Attorneys for Petitioner*