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9 Attorney for Petitioner, *Juan Gabriel Ramirez Caracosa*

10 **UNITED STATES DISTRICT COURT**
11 **SOUTHERN DISTRICT OF CALIFORNIA**

12 Juan Gabriel Ramirez CARACOSA,

13 Petitioner,

14 v.

15 KRISTI NOEM, et al.,

16 Respondents,

Case No.: 3:25-cv-03446-LL-MMP

PETITIONER'S REPLY IN SUPPORT
OF PETITION FOR WRIT OF
HABEAS CORPUS AND MOTION
FOR TEMPORARY RESTRAINING
ORDER / ORDER TO SHOW CAUSE

Honorable Judge Linda Lopez
United States District Judge

1 **PETITIONER’S REPLY IN SUPPORT OF PETITION FOR WRIT OF**
2 **HABEAS CORPUS AND MOTION FOR TEMPORARY RESTRAINING**
3

4 **ORDER / ORDER TO SHOW CAUSE**

5 On December 19, 2025, Respondents filed a Return to Petition
6
7 acknowledging that Petitioner is detained under 8 U.S.C. §1226(a) and is entitled
8 to an order from this Court directing a bond hearing be held pursuant to 8 U.S.C. §
9 1226(a) [Dkt. 7].
10

11 Accordingly, Petitioner is joining in Respondents position asks this Court to
12 enter an Order for the relief requested in the Petition:

- 13
- 14 1. Issue a writ of habeas corpus requiring that within one day, Respondents
15 release Petitioner;
 - 16 2. Alternatively, issue a writ of habeas corpus requiring Respondents to
17 provide Petitioner with a bond hearing pursuant to 8 U.S.C. § 1226(a)
18 within 7 days;
 - 19 3. Grant any other and further relief that this Court deems just and proper.
20
21

22
23
24 Dated: December 21, 2025

Respectfully Submitted,
S/ Mardy M. Sproule

25
26 Attorney for Juan Gabriel E. Ramirez
27 Caracosa,
28 Email: Mardy.Sproule@att.net

CERTIFICATE OF SERVICE

I hereby certify that on December 21, 2025, I electronically filed the foregoing Petitioners' REPLY IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS AND MOTION FOR TEMPORARY RESTRAINING ORDER / ORDER TO SHOW CAUSE with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system. All other parties shall be served in accordance with the Federal Rules of Civil Procedure.

Dated: December 21, 2025

Respectfully Submitted,
S/ Mardy M. Sproule

Attorney for Juan Gabriel E. Ramirez
Caracosa, Email:
Mardy.Sproule@att.net