

1 TODD BLANCHE
Deputy Attorney General
2 BILAL A. ESSAYLI
First Assistant United States Attorney
3 DAVID M. HARRIS
Assistant United States Attorney
4 Chief, Civil Division
DANIEL A. BECK
5 Assistant United States Attorney
Chief, Complex and Defensive Litigation Section
6 MARGARET M. CHEN (Cal. Bar No. 288294)
Assistant United States Attorney
7 Federal Building, Suite 7516
300 North Los Angeles Street
8 Los Angeles, California 90012
Telephone: (213) 894-3148
9 E-mail: Margaret.Chen@usdoj.gov

10 Attorneys for Federal Respondents

11 UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 Joaquin BELTRAN ORDUNO; Jose
Luis CASILLAS VAZQUEZ; Julian
14 DE LOS SANTOS SERRANO;
Gustavo MOLINA JACINTO; Adan de
15 los Santos SANDOVAL LEMUS;
Gustavo Alonso SIFUENTES
16 MORALES,

17 Petitioners,

18 v.

19 Kristi NOEM, Secretary, U.S. Dept. of
Homeland Security; Pamela BONDI,
20 U.S. Attorney General; Todd LYONS,
ICE Acting Director; Ernesto
21 SANTACRUZ JR., Acting Director,
Los Angeles Field Office, Immigration
22 and Customs Enforcement,
Enforcement and Removal Operations;
23 Fereti SEMAIA, Warden, Adelanto ICE
Processing Center; EXECUTIVE
24 OFFICE FOR IMMIGRATION
REVIEW; IMMIGRATION AND
25 CUSTOMS ENFORCEMENT; and
DEPARTMENT OF HOMELAND
26 SECURITY,

27 Respondents.
28

No. 5:25-cv-03332-SSS-BFM

**FEDERAL RESPONDENTS'
RESPONSE TO ORDER TO SHOW
CAUSE RE: PRELIMINARY
INJUNCTION**

Honorable Suzanne S. Sykes
United States District Judge

1 On December 16, 2025, the Court issued an Order Granting Petitioners' *Ex Parte*
2 Application for Temporary Restraining Order requiring Respondents to release or
3 provide Petitioners with individualized bond hearings before an Immigration Judge
4 pursuant to 8 U.S.C. § 1226(a) within seven (7) days of the Court's Order. (ECF 13.)
5 The Court further ordered Respondents to show cause by December 23, 2025 as to why a
6 preliminary injunction should not issue. (*Id.*) Respondents hereby show such cause.

7 On December 19, 2025, Petitioners were issued Notices setting individualized
8 bond hearings on December 22, 2025 and December 23, 2025. *See* Exhibit A.

9 Providing Petitioners with the § 1226(a) bond hearings moots the requested
10 preliminary injunction and this habeas petition more generally. *See, e.g., Javier*
11 *Gonzales, et al. v. Kristi Noem, et al.*, 5:25-cv-02054-ODW-BFM, ECF 16 (August 25,
12 2025 minute order by Hon. Judge Wright, denying as moot petitioners' pending request
13 for a preliminary injunction given their receipt of § 1226(a) bond hearings pursuant to
14 TRO, and issuing petitioners an order to show cause re: dismissal); ECF 17 (petitioners'
15 notice of voluntary dismissal); ECF 18 (order dismissing petition). *See also Moises*
16 *Salomon Zaragoza Mosqueda v. Kristi Noem et al.*, 5:25-cv-002304-CAS-BFM, ECF 15
17 (September 17, 2025 minute order by Hon. Judge Snyder, denying preliminary
18 injunction and issuing OSC re dismissal for mootness given the petitioners' receipt of
19 immigration bond hearings); and ECF 16 (notice of voluntary dismissal); *Gilberto*
20 *Gomez Garcia, et al. v. Kristi Noem, et al.*, 5:25-cv-02771-ODW-PD, ECF 13 (October
21 29, 2025 minute order by Hon. Judge Wright, denying as moot petitioners' pending
22 request for a preliminary injunction given receipt of § 1226(a) bond hearings pursuant to
23 TRO).

24 While Respondents continue to oppose the issuance of a preliminary injunction
25 pursuant to the legal positions stated in Respondents' brief in opposition to Petitioners'
26 *ex parte* application for a temporary restraining order, ECF 11, and while Respondents
27 maintain that a preliminary injunction should be denied on the merits, the issuance of
28 such further preliminary injunctive relief is mooted by the provision of bond hearings

1 pursuant to the Court's Order granting the TRO.

2 Accordingly, Respondents respectfully request that Petitioners voluntarily dismiss
3 this action, or that the Court issue an order to show cause re: dismissal.
4

5 Dated: December 22, 2025

Respectfully submitted,

6 TODD BLANCHE
7 Deputy Attorney General
8 BILAL A. ESSAYLI
9 First Assistant United States Attorney
10 DAVID M. HARRIS
11 Assistant United States Attorney
12 Chief, Civil Division
13 DANIEL A. BECK
14 Assistant United States Attorney
15 Chief, Complex and Defensive Litigation Section

12 */s/ Margaret M. Chen*

13 MARGARET M. CHEN
14 Assistant United States Attorney

15 Attorneys for Federal Respondents

16 **LOCAL RULE 11-6.2 CERTIFICATE OF COMPLIANCE**

17 The undersigned, counsel of record for Federal Respondents certifies that this
18 brief contains 368 words, which complies with the word limit of L.R. 11-6.1.

19 Dated: December 22, 2025

20 */s/ Margaret M. Chen*
21 MARGARET M. CHEN