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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

KARLA PAOLA PAREDES CHUMBIRIZO,

Petitioner,

v.

PAMELA BONDI, ET AL.,

Respondents.

CASE NO. 1:25-CV-01889-DJC-CSK

RESPONDENTS' OPPOSITION TO
TEMPORARY RESTRAINING ORDER
AND PETITION FOR WRIT OF HABEAS
CORPUS

The Petitioner, Karla Paola Paredes Chumbirizo, does not meet her burden to show a basis for a Temporary Restraining Order ("TRO"). Ms. Paredes Chumbirizo is admittedly an alien from Peru who entered the United States illegally late last year. *See* Ex 9 to Petitioner's Habeas Petition. She is then an "applicant for admission" who is subject to mandatory detention by ICE under 8 U.S.C. § 1225(b)(2)(A). *See, generally, Cortes Alonzo v. Noem et al.*, 1:25-cv-01519-WBS-SCR at Dkt. 14 (E.D. Cal. Nov. 17, 2025); *Ramos v. Lyons et al.*, 2:25-cv- 09785-SVW-AJR at Dkt. 8 (C.D. Cal. Nov. 12, 2025). She is also not entitled to a bond hearing for these same reasons. *Id.*

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1 Therefore, Ms. Paredes Chumbirizo cannot show a likelihood of success on the merits and her request
2 for a TRO should be denied without a hearing.¹

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5 Dated: December 18, 2025

ERIC GRANT
United States Attorney

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7 By: /s/ JOSHUA B. BANISTER
JOSHUA B. BANISTER
8 Assistant United States Attorney
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27 ¹ Ms. Paredes Chumbirizo appears to have been previously released by ICE under 8 U.S.C. §
28 1226 *et seq.* See Dkt. 2. Assuming that is true, the government recognizes that some judges in this
District have granted TROs like the one that she requests, at least in part, on that basis.