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8 Counsel for Petitioner

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10 **UNITED STATES DISTRICT COURT FOR THE**  
11 **EASTERN DISTRICT OF CALIFORNIA**  
12

13 Carlos ALVARADO,

14 Plaintiff,

15 v.

16 Kristi NOEM, Secretary, Department of  
17 Homeland Security; Todd LYONS, in his  
18 official capacity as Acting Director of U.S.  
19 Immigration and Customs Enforcement; Pam  
20 BONDI, Attorney General of the United  
21 States; Nancy GONZALEZ, Acting Director,  
22 Bakersfield, ICE Field Office; and Ron  
23 MURRAY, Warden, Mesa Verde ICE  
24 Processing Center.

25 Respondents.  
26  
27  
28

No. 1:25-CV-01959-DJC-CSK

PETITIONER'S NOTICE OF  
NON-OPPOSITION TO *EX*  
*PARTE* APPLICATION FOR  
TEMPORARY RESTRAINING  
ORDER

1 On December 22, 2025, the Court directed Respondent to file any Opposition  
2 to Petitioner's Motion for Temporary Restraining Order by December 28, 2025.  
3 Dkt # 5. No Opposition was filed and, therefore, the Court should deem the Motion  
4 unopposed.

5  
6 Dated: December 29, 2025

Respectfully Submitted,

S/Stacy Tolchin

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**DECLARATION OF STACY TOLCHIN**

I, Stacy Tolchin, hereby declare and state:

1. I am the attorney for Petitioner before this Court.
2. On December 22, 2025, the Court directed Petitioner to send a copy of the petition for writ of habeas corpus to the US Attorneys Office by December 23, 2025 at 11:59 a.m. at their email usacae.ecf2241-imm@usdoj.gov.
3. In accordance with the Court's order, I emailed the petition as well as the filings for the Motion for Temporary restraining order, to usacae.ecf2241-imm@usdoj.gov on December 22, 2025 at 3:06 pm.
4. On December 26, 2025 at 3:46 pm I received an email from Cheri Buxbaum, Paralegal Specialist, United States Attorney's Office, requesting until Monday December 29 to file a response because there were no attorneys available. I responded that Petitioner has no opposition. I received an additional email that Ms. Buxbaum would send a stipulation shortly. No additional email was received.

I declare under penalty of perjury of the laws of the United States of America that the above information is true and correct to the best of my knowledge and belief.

Executed this 29<sup>th</sup> day of December 2025 at Pasadena, CA.

S/ Stacy Tolchin

Stacy Tolchin