

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Sandra Elizabeth Chasipanta Llangari,

Petitioner,

v.

Pamela Bondi, Attorney General,

Kristi Noem, Secretary, U.S. Department
of Homeland Security,

Todd M. Lyons, Acting Director of
Immigration and Customs Enforcement,
and

David Easterwood, Acting Director, St.
Paul Field Office Immigration and
Customs Enforcement.

Respondents.

Case No. 0:26-cv-00283

**REPLY BRIEF IN SUPPORT OF
THIRD MOTION FOR AN ORDER
TO SHOW CAUSE**

Petitioner incorporates by reference her previously filed motions to show cause and related exhibits. (Doc. Nos. 8, 11, 19, 21, and 22). On January 26, 2026, this Court issued an order to show cause why Respondents should not be sanctioned for their failure to comply with this Court's Orders by (1) failing to provide information to the Court about the location of Petitioner's release; (2) failure to return Petitioner's driver's license and \$114 in cash; and (3) failure to follow the Court's release order, which did not include conditions. (Doc. No. 20). The Court directed Respondents to submit "a

reasoned memorandum and any necessary supporting declarations or exhibits to support their positions on these three issues,” and provided Respondents well over a week to submit a response. *Id.*

Nine days later, Respondents filed a one-page “status update,” without any supporting declarations or exhibits, which vaguely asserts that Respondents “ha[ve] taken steps, and will continue to take steps, to mitigate the Court’s concerns.” (Doc. No. 23). The status update also generally represents that counsel “has communicated with Respondents about the need to return Petitioner’s belongings” and “is working with Respondent on ensuring that information is provided on release for detainees, to the fullest extent practicable, going forward,” without providing any further detail or explanation as to when such conversations have occurred, with whom, or why Respondents have no difficulty detaining people and whisking them out of the state in a matter of hours, but nonetheless require days or weeks to simply comply with this Court’s orders. *Id.*

Petitioner respectfully submits that this Court should refuse to allow Respondents to delay compliance with this Court’s orders without consequence, and that Respondents should be sanctioned. To be clear, Petitioner is not seeking sanctions against Respondents’ counsel; to the contrary, as far as Petitioner is presently aware, Respondents’ counsel appears to be doing their best to advise, and insulate, their client under the challenging circumstances of representing a client with little regard for this Court’s authority. What is obvious, however, is the willful contempt of Respondents and their agents. There can be no doubt that Respondents have immense resources at their

disposal, which could be used to ensure compliance with this Court's orders. Instead, Respondents chose time and again to focus their immense resources towards terrorizing the people of the Twin Cities, indefinitely detaining as many immigrants as they can get their hands on, and shipping them beyond the District of Minnesota as quickly as they can, while failing to allocate even a fraction of those resources to appropriately releasing the scores of people they are illegally detaining in the process. *See, e.g.*, Order to Show Cause, Juan T.R. v. Noem, et al., Case No. 0:26-cv-00107 (PJS/DLM), Doc. No. 7 (Jan. 26, 2026); Order, Juan T.R. v. Noem, et al., Case No. 0:26-cv-00107 (PJS/DLM), Doc. No. 10 (January 28, 2026) ("Attached to this order is an appendix that identifies 96 court orders that ICE has violated in 74 cases. The extent of ICE's noncompliance is almost certainly substantially understated.").

Respondents have provided no explanation for their repeated noncompliance with this court's orders in this case, and instead ask this Court to grant them yet another extension of time without regard for the cruel human impact of swiftly and illegally snatching people from their homes, vehicles, and neighborhoods, while then moving at a snail's pace once court-ordered to release those same people. Petitioner respectfully requests that this Court not allow Respondents' contempt to remain insulated and impose sanctions on Respondents.

Respectfully submitted,

Date: February 5, 2026

//s//Claire Nicole Glenn

Claire Nicole Glenn (she/her)

Staff Attorney

Climate Defense Project

P.O. Box 7040

Minneapolis, MN 55407

651-343-4816

claire@climatedefenseproject.org

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District of Columbia License No. 888242412

Maryland License No. 1902280002

Minnesota License No. 0402443

Attorney for Petitioner