

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

VERONICA CARAPIA BARROSO,

Petitioner,

v.

Todd LYONS, in his capacity as Acting
Director, Immigration and Customs
Enforcement; **Kristi NOEM**, Secretary, U.S.
Department of Homeland Security; **Pamela
BONDI**, U.S. Attorney General; **EXECUTIVE
OFFICE FOR IMMIGRATION REVIEW;
WARDEN**, of South Texas ICE Processing
Center, Pearsall, Texas

Respondents.

Case No. 5:26-cv-234-XR

**PETITIONER'S OPPOSITION
TO RESPONDENT'S MOTION
FOR UNTIMELY FILING**

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RESPONDENT'S MOTION FOR UNTIMELY FILING**

Petitioner remains detained because of Respondents' direct defiance of the December 18th Court Order in *Maldonado-Bautista*. *Maldonado Bautista v. Noem*, No. 5:25-cv-01873-SSS-BFM (C.D. Cal.) Respondents have issued an internal memo that Immigration Judges should defy the Court Order and continue to refuse to hold bond hearings, as though court orders were somehow optional. Dkt. 1-4. Because Ms. Carapia was not detained when she crossed the border without inspection in 2021, she is a member of the *Maldonado Bautista* class.

Respondents now seek to file an untimely response to the Petition for Habeas Corpus because they have too many habeas cases, as stated in their motion. Respondents have exhausted themselves and this Court. Their failure to respond timely is not an "inadvertent mistake" as they

would have this Court believe, but rather, the direct result of their unlawful detention practices and refusal to follow Court orders.

Petitioner strongly opposes any extension of the deadline. This Court should deem the Petition for Habeas Corpus as unopposed and order the immediate release of Ms. Carapia Barroso.

Respectfully submitted this 3rd date of February 2026,

/s/ Jennifer Scarborough /s/
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PROOF OF SERVICE

All parties have been served through this Court's electronic filing system.

Dated: 02/03/2026

/s/ Jennifer Scarborough /s/
Jennifer Scarborough
Attorney for Petitioner