

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

VALENTINA DE LOS ANGELES TIAPA MORENO,

Petitioner,

v.

No.2:26-cv-00273-MIS-DLM

PAMELA BONDI, et. al.,

Respondents.

RESPONSE REGARDING ENJOINING TRANSFER

Pursuant to the Court's Order to Show Cause (Doc. 7) filed on February 4, 2026, Federal Respondents hereby state the following:

Respondents do not have any information to provide to the Court as to why they should not be preliminarily enjoined from transferring petitioner out of the District during the pendency of the underlying habeas case.

Respectfully submitted,

TODD BLANCHE
Deputy Attorney General
RYAN ELLISON
First Assistant United States Attorney

/s/ Allison Shokes
ALLISON SHOKES
Assistant United States Attorney
201 Third Street NW, Suite 900
Albuquerque, New Mexico 87102
(505) 346-7274; Fax (505) 346-7205
allison.shokes@usdoj.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 5, 2026, I filed the foregoing pleading electronically through the CM/ECF system, which caused all parties and counsel of record to be served, as more fully reflected on the Notice of Electronic Filing.

/s/ Allison Shokes
ALLISON SHOKES
Assistant United States Attorney