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**UNITED STATES DISTRICT COURT
DISTRICT OF UTAH**

EDWIN ADOLFO LEMUS CRISTALES,

Petitioner,

v.

RYAN ARBON, Weber County Sheriff;
RUBEN LEYVA, Acting Field Office
Director, Salt Lake City Enforcement and
Removal Operations, U.S. Immigration and
Customs Enforcement (ICE/ERO); BRIAN
HENKE Field Office Director for Las
Vegas/Salt Lake City; KRISTI NOEM,
Secretary United States Department of
Homeland Security; PAMELA BONDI, U.S.
Attorney General,

Defendants.

**PETITIONER'S RESPONSE IN
OPPOSITION TO RESPONDENTS'
MOTION TO CONTINUE**

Case No. 2:26-cv-00217

Judge: Jill N. Parrish

Petitioner Edwin Adolfo Lemus Cristales, by and through undersigned counsel, respectfully submits this response in opposition to Respondents' Motion to Continue the Order to Show Cause hearing.

Petitioner respectfully opposes Respondents' request to continue the hearing currently set for March 27, 2026. This case concerns Petitioner's ongoing detention, which he contends is in

violation of the Constitution and laws of the United States. In light of the liberty interests at stake and the expedited schedule established by the Court, Petitioner submits that further delay is not warranted.

Moreover, Respondents' request arises from circumstances of their own making and in contravention of this Court's Order to Show Cause (ECF No. 5). The Court expressly ordered "that the Petitioner shall not be transferred except to a facility where Petitioner can be transported and made available for in-person hearings." ECF No. 5 at 4. Despite this clear directive, Respondents transferred Petitioner to a detention facility in California. It is difficult to reconcile that transfer with the Court's Order. A detention facility located in California—hundreds of miles from this Court—plainly does not satisfy the requirement that Petitioner be housed in a location from which he can be made available for in-person proceedings before this Court in Utah. While Petitioner recognizes the logistical challenges described by Respondents, those circumstances weigh against, rather than in favor of, postponing the hearing.

In order to avoid further delay, Petitioner does not oppose Respondents' alternative request and is willing to appear telephonically for the March 27, 2026 hearing. Petitioner is prepared to proceed as scheduled and respectfully submits that a telephonic appearance provides a reasonable means of moving forward without continuing the matter.

For these reasons, Petitioner respectfully requests that the Court deny Respondents' motion to continue and proceed with the hearing as scheduled, with Petitioner appearing telephonically if necessary.

RESPECTFULLY SUBMITTED this March 25, 2026.

TRUJILLO LAW GROUP

/s/ Christopher Vizcardo

Christopher Vizcardo

Attorney for Petitioner