

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

CARLOS NUNEZ NARANJO,

Petitioner,

v.

Case No.: 3:26-cv-1080-MMH-PDB

WARDEN, North Florida Detention
Center, et al.,

Respondents.

RESPONSE TO ORDER TO SHOW CAUSE

Federal Respondents, by and through counsel, hereby respond to the Court's Order to Show Cause ("Order") (Doc. 2). In response to the Court's Order, the U.S. Immigration and Customs Enforcement contends that there is a significant likelihood that Petitioner—Carlos Nunez Naranjo—will be removed in the reasonably foreseeable future, and provided a supporting declaration from Deportation Officer Bradford A. Rubinoff. Doc. 6-1. However, the United States Attorney's Office does not believe this declaration sufficient to demonstrate that Petitioner will be removed in the reasonably foreseeable future.

In view of this District's rulings in many previous cases presenting similar circumstances,¹ the United States Attorney's Office anticipates that the Court will

¹ See e.g. *Suarez-Rosabal v. Warden, Florida Soft Side South, et al.*, No. 2:26-cv-1376-KCD-DNF (M.D. Fla. May 20, 2026) (ordering release after the presumptively reasonable period expired where the record reflected "the total absence of any travel documents for his removal"); *Betancourt v. Alcatraz*, No. 2:26-CV-1403-KCD-NPM, 2026 WL 1320246, at *2 (M.D. Fla. May 13, 2026) (finding the burden shifted where Mexico refused entry and ICE relied on a declaration from a Deportation Officer describing the procedures to be followed to effect removal to Mexico); *Londres v. Warden, S.*

conclude that these materials lack sufficient detail to meet the government's burden in justifying. Accordingly, Federal Respondents do not oppose Petitioner's request for release at this time, subject to supervision pursuant to 8 U.S.C. § 1231(a)(3), within 72 hours of any Order of this Court.

Dated: June 3, 2026

Respectfully submitted,

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/s/ Kyesha Mapp
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Fla. Det. Facility, No. 2:26-CV-935-JES-NPM, 2026 WL 1260847, at *2 (M.D. Fla. May 8, 2026) (finding burden-shifting framework triggered and SLRRFF not established where ICE asserted that they are seeking removal but did not explain why progress had not been made in Petitioner's 184 days in custody); *Blanco Rivero v. Noem, et al.*, No. 2:26-cv-00353, 2026 WL 820499, at *2 (M.D. Fla. Mar. 25, 2026) (finding ICE absence of documentation to support SLRRFF amounted to "hope and a placeholder.").

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 3, 2026, I electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system. I further certify that a downloaded copy of the filed document will be sent via U.S. Mail to the following non-CM/ECF participant listed below on June 4, 2026.

Carlos Nunez Naranjo, *pro se*

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/s/ Kyesha Mapp
KYESHA MAPP
Assistant United States Attorney