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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

PARDEEP KUMAR,

Petitioner

V.

WARDEN, GOLDEN STATE ANNEX;
Enforcement and Removal
Operations (ERO); U.S.
Immigration and Customs
Enforcement (ICE); Department
of Homeland Security (DHS),

Respondent

Civil Action No.:

1:26-cv-05057-KES-EGC

PETITIONER'S EMERGENCY MOTION TO ENFORCE THE COURT'S JULY
9, 2026 ORDER GRANTING THE PETITION FOR WRIT OF HABEAS
CORPUS; REQUEST FOR IMMEDIATE COMPLIANCE; REQUEST FOR ORDER
TO SHOW CAUSE WHY RESPONDENTS SHOULD NOT BE HELD IN CIVIL
CONTEMPT

MEMORANDUM OF POINTS AND AUTHORITIES

INTRODUCTION

Nine days ago, this Court granted Petitioner's Petition for Writ of Habeas Corpus, entered final judgment in Petitioner's favor, ordered Respondents to "release petitioner Pardeep Kumar ... immediately," permanently enjoined Respondents from re-detaining him absent a constitutionally adequate pre-deprivation bond hearing, directed that judgment be entered, and ordered the Clerk to close the case. Release order.pdf

The Court's Order is unequivocal. It contains no conditions precedent, no delayed effective date, no stay of execution, and no authorization for Respondents to continue Petitioner's detention while they determine whether or when they intend to comply. The Court did not order Respondents to begin processing Petitioner's release. It ordered Respondents to release him immediately. Release order.pdf

Despite the clarity of the Court's directive, Respondents have failed to comply.

1 As of the filing of this Motion, Petitioner remains
2 incarcerated at Golden State Annex. Every additional hour
3 of detention is contrary to the express terms of this
4 Court's Judgment and Order. The constitutional injury that
5 prompted this Court to grant habeas relief has therefore
6 not ceased; it continues each day that Respondents refuse
7 to execute the Court's mandate.

8
9 This is no longer a dispute concerning the legality of
10 Petitioner's detention. The Court has already resolved that
11 question. After considering Respondents' opposition, the
12 Court rejected every asserted factual distinction offered
13 by Respondents, concluded that Respondents had failed to
14 identify any legally meaningful basis for denying relief,
15 granted the Petition, ordered Petitioner's immediate
16 release, entered judgment, and closed the case. Release
17 order.pdf

18
19 The only issue presently before the Court is whether
20 Respondents may disregard a final federal judgment
21 requiring Petitioner's immediate release.

22
23 They may not.
24
25

1 Federal courts possess both inherent authority and well-
2 established equitable power to enforce their judgments and
3 injunctions. Indeed, "[i]f a party fails to comply with a
4 court order, the court has broad authority through civil
5 contempt to compel obedience and preserve the integrity of
6 its judgments." *Shillitani v. United States*, 384 U.S. 364,
7 370 (1966); *McComb v. Jacksonville Paper Co.*, 336 U.S. 187,
8 191-93 (1949). That authority is particularly important
9 where, as here, the order concerns the immediate
10 restoration of an individual's physical liberty. Courts
11 cannot function if executive agencies are permitted to
12 delay compliance with clear judicial commands while
13 continuing the very constitutional deprivation the Court
14 has already held unlawful.

15
16 Petitioner therefore respectfully requests that the Court
17 immediately enforce its July 9, 2026 Judgment and Order by
18 directing Respondents to release Petitioner within twenty-
19 four (24) hours of the Court's order on this Motion.
20 Petitioner further requests that the Court require
21 Respondents to appear and show cause why they should not be
22 held in civil contempt for their continuing failure to
23 comply with the Court's express directive. Should
24 Respondents continue to disregard the Court's Order,
25 Petitioner respectfully requests that the Court impose

1 coercive sanctions sufficient to secure immediate
2 compliance and protect the authority of the Court.

3
4 **I. PROCEDURAL BACKGROUND**

5
6 Petitioner filed the present action challenging the
7 constitutionality of his re-detention following more than
8 two years of successful release under immigration
9 supervision. Petitioner alleged that Respondents violated
10 the Fifth Amendment by depriving him of his liberty without
11 constitutionally adequate pre-deprivation procedures and
12 sought immediate release through a petition for writ of
13 habeas corpus and an emergency motion for temporary
14 restraining order.

15
16 Recognizing that the constitutional issues presented in
17 this case had already been resolved in a series of
18 substantially similar decisions, the Court issued an Order
19 requiring Respondents to show cause why Petitioner's case
20 should be treated differently from the Court's prior habeas
21 decisions granting relief to similarly situated detainees.
22 Release order.pdf

23
24 Respondents opposed the Petition, arguing principally that
25 Petitioner allegedly violated certain conditions of the

1 Alternatives to Detention program and that various
2 purported "flight-risk indicators" distinguished his case
3 from the Court's prior decisions. The Court carefully
4 considered those arguments and rejected each of them.
5 Specifically, the Court concluded that the alleged
6 Alternatives to Detention violations did not eliminate
7 Petitioner's constitutional right to a pre-deprivation
8 determination before a neutral decisionmaker and further
9 held that Respondents had failed to identify any urgent
10 governmental interest that would justify postponing such a
11 hearing until after Petitioner had already been deprived of
12 his liberty. Release order.pdf

13
14 The Court likewise rejected Respondents' remaining
15 arguments concerning Petitioner's manner of entry and the
16 timing of his asylum application, observing that
17 Respondents were fully aware of Petitioner's manner of
18 entry when they initially released him from custody and
19 that Petitioner's asylum application was filed well within
20 the one-year statutory filing period established by
21 Congress. Accordingly, the Court concluded that Respondents
22 had identified no factual or legal distinction warranting
23 denial of the Petition. Release order.pdf

1 Having rejected Respondents' opposition, the Court granted
2 the Petition for Writ of Habeas Corpus. The Court expressly
3 ordered that Respondents "release petitioner Pardeep Kumar
4 ... immediately," permanently enjoined Respondents from re-
5 detaining Petitioner absent a constitutionally adequate
6 pre-deprivation bond hearing before a neutral decisionmaker
7 at which Respondents bear the burden of proving flight risk
8 or dangerousness by clear and convincing evidence, directed
9 the Clerk to enter judgment in Petitioner's favor, and
10 ordered the case closed. Release order.pdf

11
12 Notwithstanding the clarity and finality of the Court's
13 Judgment, Respondents have failed to comply. As of the
14 filing of this Motion, Petitioner remains detained at
15 Golden State Annex notwithstanding this Court's unequivocal
16 order requiring his immediate release.

17
18 **II. RESPONDENTS ARE IN CONTINUING VIOLATION OF A CLEAR,**
19 **SPECIFIC, AND UNEQUIVOCAL ORDER OF THIS COURT**
20

21 Federal courts possess the inherent authority to enforce
22 their judgments and ensure compliance with their lawful
23 orders. That authority is not ancillary to the judicial
24 power—it is indispensable to it. "If a party fails to
25 comply with a court order, the court has broad authority

1 through civil contempt to compel obedience." *Shillitani v.*
2 *United States*, 384 U.S. 364, 370 (1966). Likewise, "[t]he
3 absence of wilfulness does not relieve from civil
4 contempt," because the purpose of civil contempt is not to
5 punish past misconduct but to secure present and future
6 compliance with judicial orders. *McComb v. Jacksonville*
7 *Paper Co.*, 336 U.S. 187, 191 (1949).

8
9 The Ninth Circuit has consistently recognized that civil
10 contempt is appropriate where a party fails to comply with
11 a "specific and definite order of the court." *In re Dual-*
12 *Deck Video Cassette Recorder Antitrust Litig.*, 10 F.3d 693,
13 695 (9th Cir. 1993). Once the moving party demonstrates by
14 clear and convincing evidence that such an order existed
15 and was violated, the burden shifts to the alleged
16 contemnor to demonstrate why compliance was impossible or
17 otherwise legally excused. *FTC v. Affordable Media, LLC*,
18 179 F.3d 1228, 1239 (9th Cir. 1999). Good faith,
19 bureaucratic delay, administrative inconvenience, or
20 disagreement with the Court's legal conclusions do not
21 excuse noncompliance with a valid federal judgment. See
22 *Stone v. City & Cnty. of San Francisco*, 968 F.2d 850, 856-
23 57 (9th Cir. 1992).

1 Those principles apply with particular force here because
2 there is no genuine dispute regarding the content of this
3 Court's July 9, 2026 Order. The Court granted the Petition
4 for Writ of Habeas Corpus, entered judgment in Petitioner's
5 favor, and expressly ordered that "Respondents are ORDERED
6 to release petitioner Pardeep Kumar (A-Number: 
7 immediately." The Court further enjoined Respondents from
8 re-detaining Petitioner absent a constitutionally adequate
9 pre-deprivation bond hearing before a neutral decisionmaker
10 and directed the Clerk to close the case. Release order.pdf

11
12 The operative language of the Order admits of only one
13 reasonable interpretation. The Court did not order
14 Respondents to begin processing Petitioner's release. It
15 did not authorize Respondents to continue detaining
16 Petitioner while they completed internal administrative
17 procedures. Nor did it provide Respondents with a period of
18 time within which to determine whether they would comply.
19 Instead, the Court used the mandatory term "ORDERED" and
20 modified that command with the unequivocal directive that
21 release occur "immediately." Release order.pdf

22
23 That choice of language is significant. Federal courts
24 routinely distinguish between orders requiring action
25 "within" a specified number of days and those requiring

1 action "immediately." By directing immediate release, the
2 Court unmistakably concluded that the constitutional
3 violation identified in its Order could not continue even
4 temporarily. Indeed, that conclusion is entirely consistent
5 with the nature of the relief granted. Habeas corpus exists
6 to remedy unlawful restraints on liberty. Once the Court
7 determined that Petitioner's continued detention violated
8 the Constitution and granted the writ, every additional day
9 of confinement became inconsistent with the judgment
10 entered in this case.

11
12 Respondents cannot reasonably claim uncertainty regarding
13 their obligations. The Court's Order followed full briefing
14 in which Respondents had every opportunity to identify
15 factual or legal distinctions that, in their view,
16 justified continued detention. They argued that
17 Petitioner's alleged violations of the Alternatives to
18 Detention program warranted denying relief. They argued
19 that Petitioner's manner of entry into the United States
20 and the timing of his asylum application demonstrated
21 flight risk. The Court carefully considered those arguments
22 and rejected each one, concluding that none distinguished
23 Petitioner's case from the Court's prior decisions granting
24 habeas relief. Release order.pdf

1 The Court specifically held that the alleged Alternatives
2 to Detention violations did not extinguish Petitioner's due
3 process right to a pre-deprivation determination before a
4 neutral decisionmaker and further concluded that
5 Respondents had identified no urgent governmental interest
6 sufficient to justify postponing that determination until
7 after Petitioner had already been deprived of his liberty.
8 Release order.pdf Likewise, the Court rejected Respondents'
9 reliance upon Petitioner's manner of entry and the timing
10 of his asylum application, explaining that DHS already knew
11 how Petitioner entered the country when it chose to release
12 him in 2024 and that his asylum application was filed well
13 within the one-year filing period established by Congress.
14 Release order.pdf

15
16 Accordingly, there is no unresolved legal issue remaining
17 for Respondents to evaluate before complying with the
18 Court's judgment. The legality of Petitioner's detention
19 has already been adjudicated. Judgment has already been
20 entered. The case has already been closed. The only
21 remaining obligation imposed upon Respondents is compliance
22 with the Court's unequivocal directive requiring
23 Petitioner's immediate release.
24
25

1 Yet, despite the finality of that judgment, Respondents
2 continue to incarcerate Petitioner. Each passing day
3 therefore represents not merely the continuation of the
4 constitutional injury previously identified by this Court,
5 but an ongoing failure to comply with a binding federal
6 judgment. Such continued detention undermines both the
7 relief awarded by the Court and the fundamental principle
8 that executive officials are bound by final judgments of
9 Article III courts unless and until those judgments are
10 stayed or reversed through appropriate judicial process.

11
12 Respondents have not obtained a stay pending appeal. They
13 have not requested clarification of the Court's Order. They
14 have not sought modification of the judgment. Nor has any
15 appellate court suspended the effect of this Court's
16 injunction. In the absence of such relief, Respondents
17 remain obligated to comply fully with the Court's
18 directive, regardless of whether they intend to appeal or
19 continue to disagree with the Court's constitutional
20 analysis. See *United States v. United Mine Workers of Am.*,
21 330 U.S. 258, 293-94 (1947) (holding that court orders must
22 be obeyed unless stayed or set aside through proper
23 judicial procedures).

1 Under these circumstances, the Court should exercise its
2 inherent authority to enforce its judgment. Petitioner's
3 continued detention is contrary to the express terms of the
4 Court's July 9 Order and cannot be reconciled with
5 Respondents' obligation to comply with binding federal
6 judgments. Immediate enforcement is therefore necessary not
7 only to vindicate Petitioner's constitutional rights, but
8 also to preserve the authority and integrity of this
9 Court's orders.

10
11 **III. THE COURT SHOULD IMMEDIATELY ENFORCE ITS JUDGMENT AND**
12 **REQUIRE RESPONDENTS TO SHOW CAUSE WHY THEY SHOULD NOT BE**
13 **HELD IN CIVIL CONTEMPT**

14
15 The purpose of civil contempt is not to punish past
16 conduct, but to secure present compliance with lawful
17 judicial orders and to preserve the authority of the
18 courts. Shillitani, 384 U.S. at 370. Civil contempt is
19 therefore particularly appropriate where, as here, a party
20 continues to disregard a clear and unambiguous injunction
21 requiring affirmative action. Once a court determines that
22 its order has not been obeyed, it possesses broad
23 discretion to fashion coercive relief sufficient to compel
24 compliance and ensure that its judgment is not rendered
25 meaningless. McComb, 336 U.S. at 191-93.

1
2 Petitioner does not lightly request that this Court invoke
3 its contempt authority. Federal agencies are ordinarily
4 expected to comply promptly and faithfully with the orders
5 of Article III courts. Indeed, our constitutional system
6 depends upon the Executive Branch's adherence to final
7 judicial judgments, even where the Government disagrees
8 with the underlying legal conclusions. Judicial review
9 would have little practical value if executive agencies
10 were free to postpone compliance with unfavorable judgments
11 until such time as they determined compliance to be
12 administratively convenient.

13
14 Unfortunately, that appears to be precisely what has
15 occurred here.

16
17 Nine days have elapsed since this Court entered judgment
18 and ordered Petitioner's immediate release. During that
19 period, Respondents have continued to confine Petitioner
20 despite the absence of any stay, modification, or appellate
21 order suspending the effectiveness of this Court's
22 judgment. Every day that has passed represents an
23 additional day of detention that this Court has already
24 determined is unlawful. The continued incarceration of
25 Petitioner therefore constitutes not merely noncompliance

1 with the Court's Order, but the ongoing continuation of the
2 very constitutional violation that prompted issuance of the
3 writ.

4
5 Respondents may contend that internal administrative
6 procedures, transportation logistics, supervisory
7 approvals, or other operational considerations have delayed
8 Petitioner's release. Such explanations, even if offered,
9 cannot justify continued noncompliance with the Court's
10 express directive. Government agencies may not unilaterally
11 extend deadlines established by judicial order simply
12 because compliance requires administrative effort. If
13 Respondents believed that immediate compliance was
14 impossible or that additional time was necessary, the
15 proper course was to seek relief from this Court before
16 disregarding its Order—not to continue detaining Petitioner
17 while remaining silent.

18
19 Nor would the filing of a notice of appeal, standing alone,
20 excuse Respondents' failure to comply. It is a fundamental
21 principle of federal practice that an appeal does not
22 automatically stay the enforcement of a district court's
23 judgment. Rather, a party seeking to suspend the effect of
24 an injunction must obtain a stay from the district court or
25 the court of appeals. *Nken v. Holder*, 556 U.S. 418, 433-34

1 (2009); Fed. R. Civ. P. 62. Respondents have obtained no
2 such stay here. Consequently, the July 9, 2026 Order
3 remains fully operative and binding upon all Respondents
4 until modified or vacated through appropriate judicial
5 proceedings.

6
7 Moreover, the extraordinary nature of habeas corpus relief
8 underscores the necessity of immediate compliance. The writ
9 has long occupied a unique place in Anglo-American
10 jurisprudence as the "fundamental instrument for
11 safeguarding individual freedom against arbitrary and
12 lawless state action." Harris v. Nelson, 394 U.S. 286, 290-
13 91 (1969). When a federal court grants habeas relief and
14 orders the immediate release of an individual from unlawful
15 custody, that judgment is not advisory. It commands
16 immediate obedience because each additional day of unlawful
17 detention inflicts a fresh constitutional injury. Delayed
18 compliance is therefore incompatible with both the purpose
19 of the Great Writ and the express terms of this Court's
20 Order.

21
22 The prejudice to Petitioner from continued noncompliance is
23 substantial and ongoing. As this Court recognized in
24 granting the Petition, Petitioner's continued detention
25 violates the Due Process Clause absent a constitutionally

1 adequate pre-deprivation determination. Respondents'
2 refusal to execute the Court's judgment has therefore
3 deprived Petitioner of the relief that this Court has
4 already determined he is entitled to receive. The
5 constitutional injury has not ended; it continues with
6 every hour that Petitioner remains confined notwithstanding
7 the Court's order directing his immediate release.

8
9 By contrast, requiring Respondents to comply immediately
10 imposes no legally cognizable prejudice upon the
11 Government. The Court has already determined that
12 Respondents failed to identify any factual or legal basis
13 justifying Petitioner's continued detention. The Court has
14 likewise permanently enjoined Respondents from re-detaining
15 Petitioner absent a pre-deprivation hearing before a
16 neutral decisionmaker at which Respondents establish, by
17 clear and convincing evidence, that detention is legally
18 warranted. Release order.pdf Compliance with the Court's
19 Order therefore requires Respondents to do no more than
20 what the Court has already adjudged the Constitution
21 demands.

22
23 Under these circumstances, the Court should exercise its
24 inherent authority to ensure that its judgment is
25 respected. Petitioner respectfully submits that the

1 appropriate course is to order Respondents to effectuate
2 Petitioner's release no later than twenty-four (24) hours
3 after entry of the Court's order on this Motion. In
4 addition, because Respondents have continued to disregard a
5 clear and unequivocal judicial command, the Court should
6 require Respondents to appear and show cause why they
7 should not be held in civil contempt. Such an order will
8 afford Respondents a full opportunity to explain their
9 noncompliance while preserving the Court's ability to
10 impose coercive sanctions should continued disobedience
11 occur.

12
13 The authority of the federal judiciary depends not merely
14 upon its power to decide cases, but upon the faithful
15 execution of its judgments. Having determined that
16 Petitioner's continued detention is unlawful and having
17 ordered his immediate release, the Court should now enforce
18 its judgment to ensure that its mandate is carried out
19 without further delay.

20
21 **IV. THE COURT SHOULD ORDER IMMEDIATE COMPLIANCE AND, IF**
22 **NECESSARY, IMPOSE COERCIVE SANCTIONS TO ENSURE ITS JUDGMENT**
23 **IS OBEYED**
24
25

1 The Court possesses broad equitable authority to fashion
2 whatever relief is reasonably necessary to enforce its
3 judgments and secure compliance with its lawful orders.
4 That authority necessarily includes the power to issue
5 supplemental enforcement orders, establish firm compliance
6 deadlines, require sworn explanations for noncompliance,
7 and impose coercive sanctions where lesser measures prove
8 insufficient. See *McComb v. Jacksonville Paper Co.*, 336
9 U.S. 187, 193 (1949). The exercise of that authority is
10 particularly appropriate where the order being enforced
11 concerns an individual's physical liberty.

12
13 Here, the need for prompt judicial intervention cannot
14 reasonably be disputed. The Court has already concluded
15 that Petitioner's continued detention violates the
16 Constitution and expressly ordered his immediate release.
17 Nevertheless, despite the passage of nine days since entry
18 of judgment, Petitioner remains incarcerated. Unless this
19 Court acts to enforce its prior Order, Respondents'
20 continued noncompliance will effectively nullify the relief
21 already awarded and permit the constitutional injury
22 identified by the Court to continue indefinitely.

23
24 The Supreme Court has long recognized that habeas corpus is
25 intended to provide a "swift and imperative remedy" against

1 unlawful detention. *Fay v. Noia*, 372 U.S. 391, 400 (1963),
2 overruled on other grounds by *Wainwright v. Sykes*, 433 U.S.
3 72 (1977). That purpose would be frustrated if executive
4 officials could continue detaining a successful habeas
5 petitioner after a federal court has ordered his immediate
6 release. The efficacy of the writ depends not merely upon
7 the issuance of judicial relief, but upon the prompt
8 execution of the Court's command.

9
10 Accordingly, Petitioner respectfully requests that the
11 Court issue an order requiring Respondents to release
12 Petitioner no later than twenty-four (24) hours after
13 service of the Court's order on this Motion. Given that
14 Respondents have already had nine days to comply with the
15 Court's original directive, any additional delay would be
16 difficult to reconcile with the Court's unequivocal command
17 that Petitioner be released "immediately." Release
18 order.pdf

19
20 To ensure meaningful compliance, the Court should further
21 require Respondents to file, within the same twenty-four-
22 hour period, a Notice of Compliance confirming that
23 Petitioner has been released and identifying the date,
24 time, and manner of his release. Such a filing would
25 eliminate any uncertainty regarding compliance while

1 creating a clear record demonstrating whether Respondents
2 have obeyed the Court's judgment.

3
4 If Respondents contend that compliance has not occurred
5 because release is impossible, they should be required to
6 demonstrate that impossibility with competent evidence
7 under oath. The Ninth Circuit has repeatedly held that a
8 party asserting impossibility as a defense to civil
9 contempt bears a "heavy burden" of demonstrating that
10 compliance was factually impossible despite taking "all
11 reasonable steps" to comply with the court's order. *FTC v.*
12 *Affordable Media, LLC*, 179 F.3d 1228, 1239-40 (9th Cir.
13 1999). Conclusory assertions, generalized references to
14 administrative procedures, or internal bureaucratic
15 processes are insufficient to satisfy that burden. A party
16 may not create its own impossibility by choosing not to
17 comply with a judicial order.

18
19 At present, however, Respondents have made no such showing.
20 They have not informed the Court that compliance is
21 impossible. They have not requested clarification of the
22 Court's Order. They have not sought an extension of time.
23 They have not obtained a stay. Instead, they have simply
24 continued to detain Petitioner notwithstanding a final
25 judgment directing his immediate release. Under these

1 circumstances, an order requiring Respondents to explain
2 their noncompliance under oath is both appropriate and
3 necessary.

4
5 Should Respondents fail to comply with the Court's
6 enforcement order, Petitioner respectfully requests that
7 the Court proceed with an expedited order to show cause
8 hearing and impose such coercive sanctions as may be
9 necessary to secure compliance. Those sanctions may include
10 escalating daily monetary sanctions until Petitioner is
11 released, reimbursement of Petitioner's reasonable
12 attorney's fees and costs incurred in enforcing the Court's
13 judgment, and any additional coercive relief the Court
14 deems appropriate under its inherent authority. Such
15 sanctions would not be punitive; rather, they would serve
16 the traditional civil-contempt purpose of compelling
17 compliance with a lawful judicial order and preserving the
18 authority of the Court.

19
20 This Court has already fulfilled its constitutional role by
21 adjudicating the legality of Petitioner's detention and
22 granting the writ of habeas corpus. The only remaining
23 question is whether its judgment will be effectuated.
24 Because the continued detention of Petitioner directly
25 contravenes the Court's express order and perpetuates the

1 constitutional violation already identified by the Court,
2 immediate enforcement is both necessary and appropriate.

3
4 **V. CONCLUSION**

5
6 For the foregoing reasons, Petitioner respectfully requests
7 that the Court:

8
9 1. Grant this Emergency Motion to Enforce the Court's July
10 9, 2026 Judgment and Order;

11 2. Order Respondents to release Petitioner Pardeep Kumar
12 (A#  from immigration custody within twenty-
13 four (24) hours of service of the Court's order on this
14 Motion;

15 3. Order Respondents to file, within twenty-four (24)
16 hours, a Notice of Compliance certifying under oath that
17 Petitioner has been released and identifying the date and
18 time of his release;

19 4. Issue an Order to Show Cause requiring Respondents to
20 appear and explain why they should not be held in civil
21 contempt for failing to comply with this Court's July 9,
22 2026 Order;

23 5. Schedule an expedited hearing on the Order to Show Cause
24 if Respondents fail to comply with the Court's enforcement
25 order;

1 6. Award Petitioner his reasonable attorney's fees and
2 costs incurred in enforcing the Court's judgment, together
3 with any other coercive sanctions the Court determines are
4 necessary to compel compliance; and

5 7. Grant such other and further relief as the Court deems
6 just and proper.

7
8 Respectfully submitted,

9 Dated: JULY 20, 2026

10 

11
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