

ERIC GRANT
United States Attorney
JONATHAN WILLIAMS
Special Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700

Attorneys for Respondents

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JENNY FABIOLA BARBECHO MOROCHO,
Petitioner,
v.
CHRISTOPHER CHESTNUT ET AL.,
Respondents.

No. 1:26-CV-05223-VC

RESPONSE TO PETITION

This case is in the category of cases for which the Court has typically ordered immediate release.

Respondents' position is that Petitioner entered the United States illegally. Exh. A at 3–4. Petitioner is thus an “applicant for admission” who is subject to mandatory immigration detention under 8 U.S.C. § 1225(b). *Joaquin Herrera Avila v. Bondi*, No. 25-3741 (8th Cir. March 25, 2026); *Buenrostro-Mendez v. Bondi*, No. 25-20496, 2026 WL 323330, at *1 (5th Cir. Feb. 6, 2026); *see also Cortes Alonzo v. Noem*, 1:25-cv-01519-WBS-SCR at Dkt. 14 (E.D. Cal. Nov. 17, 2025). Petitioner does not possess the right to freedom from immigration detention in any form other than the form provided by Congress. *Shaughnessy v. United States ex rel. Mezei*, 345 U.S. 206, 212 (1953), *reaffirmed in DHS v. Thuraissigiam*, 591 U.S. 103, 139 (2020).

Respondents ask to submit on this pleading without additional documentation or briefing and request that the Court rule on the petition in its entirety.

1 Dated: July 10, 2026

Respectfully submitted,

2 ERIC GRANT

3 United States Attorney

4 By: /s/ Jonathan Williams
JONATHAN WILLIAMS
5 Special Assistant United States Attorney
Attorneys for Respondents