

Galina Dorris (SBN 365131)
GAVRILOV & BROOKS
2315 Capitol Avenue
Sacramento, CA 95816
Telephone: (916) 504-0529
Facsimile: (916) 473-5870
Email: info@gavrilovlaw.com

Attorney for Petitioner,
RICHARD JEUDY

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

RICHARD JEUDY

Petitioner,

v.

WARDEN, CENTRAL VALLEY
ANNEX DETENTION FACILITY, ET
AL.,

Respondents.

Case No.: 1:26-CV-05329-TLN-CKD

**PETITIONER'S REPLY BRIEF AND
REQUEST FOR LEAVE TO FILE
SUPPLEMENTAL REPLY BRIEF**

Petitioner, through newly appointed counsel, respectfully submits this response and requests leave to file a supplemental reply brief following Petitioner's scheduled immigration individual hearing on August 20, 2026.

Undersigned counsel was recently appointed to represent Petitioner in this matter. Since appointment, counsel has reviewed the Court's docket, the administrative record available to date, Petitioner's pro se filings, and Respondents' Motion to Dismiss. Counsel has also met with

1 Petitioner and communicated with Petitioner's family to evaluate the factual and procedural
2 posture of the case.

3
4 At this time, counsel respectfully requests that the Court permit Petitioner to file a
5 supplemental reply brief after August 20, 2026, the date currently scheduled for Petitioner's
6 individual hearing before the Immigration Judge. Exhibit A. The outcome of that hearing may
7 materially affect the issues presented in this habeas proceeding and may clarify the parties'
8 respective positions. Allowing supplemental briefing after the hearing would promote judicial
9 economy and permit the Court to consider the most complete and current factual and procedural
10 record.
11

12
13 In addition, Petitioner's detention continues to evolve while this matter remains pending.
14 Depending on the duration and status of Petitioner's detention following the scheduled
15 immigration proceedings, additional legal and constitutional issues relating to the continued
16 lawfulness of detention may become ripe for adjudication. A supplemental reply would allow the
17 parties to address any developments that bear on the issues before this Court.
18

19 Petitioner respectfully requests that the Court defer consideration of Respondents' Motion
20 to Dismiss and grant Petitioner leave to file a supplemental reply brief within fourteen (14) days
21 after the conclusion of the August 20, 2026 individual hearing, or within such other time as the
22 Court deems appropriate.
23

24
25 Respectfully Submitted,

26
27 Dated: August 3, 2026

By: /s/ Galina Dorris
Galina Dorris
ATTORNEY FOR PETITIONER