

United States District Court
Western District of Texas
San Antonio Division

Gabriel Guicara Chauran,
Petitioner,

v.

Kristi Noem, Secretary of United States
Department of Homeland Security et. al.,
Respondents.

No. 5:25-cv-01173-JKP

**Response in Opposition to
Petitioner's Motion for Temporary Restraining Order
and/or Preliminary Injunctive Relief**

Petitioner, through counsel, filed a habeas petition with this Court on or about September 18, 2025. ECF No. 1. On September 23, 2025, Petitioner filed a Motion for Temporary Restraining Order (TRO) and/or Preliminary Injunction. ECF No. 3. On the same day, this Court ordered Respondents to file a response by 12pm CST today, September 29, 2025. ECF No. 4.

Petitioner remains in ICE custody as of the time of this filing. The undersigned AUSA is working jointly with the Department of Justice Office of Immigration Litigation to secure Petitioner's release from custody as soon as possible in light of his claim to temporary protected status. Respondents will file a status update with this Court upon Petitioner's release from custody, or Respondents will comply with any Court order to provide status updates in the interim.

Respectfully submitted,

Justin R. Simmons
United States Attorney

By: /s/ Lacy L. McAndrew
Lacy L. McAndrew
Assistant United States Attorney
Florida Bar No. 45507
601 N.W. Loop 410, Suite 600
San Antonio, Texas 78216
(210) 384-7325 (phone)
(210) 384-7312 (fax)
lacy.mcandrew@usdoj.gov

Attorneys for Respondents