

1 BILAL A. ESSAYLI
First Assistant United States Attorney
2 DAVID M. HARRIS
Assistant United States Attorney
3 Chief, Civil Division
DANIEL A. BECK (Cal. Bar No. 204496)
4 Assistant United States Attorney
SARAH L. CRONIN (Cal. Bar No. 252624)
5 Assistant United States Attorney
Federal Building, Suite 7516
6 300 North Los Angeles Street
Los Angeles, California 90012
7 Telephone: (213) 894-4061
E-mail: Sarah.Cronin@usdoj.gov
8
9 Attorneys for Federal Respondents

10 UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
12

13 FERMIN PERALTA VALLADARES,

14 Petitioner,

15 v.

16 TODD LYONS, Acting Director,
Immigration and Customs Enforcement,
17 et al.,

18 Respondents.

No. 2:25-cv-09724-VBF-KES

**FEDERAL RESPONDENTS'
OPPOSITION TO ORDER TO SHOW
CAUSE RE: PRELIMINARY
INJUNCTION**

Honorable Valerie B. Fairbank United
States District Judge

RESPONDENTS' OPPOSITION TO OSC RE: PRELIMINARY INJUNCTION

On November 4, 2025, the Court issued an order to show cause [Dkt. 7] why a preliminary injunction should not issue. Respondents hereby show such cause.

Petitioner received a bond hearing on November 7, 2025. *See* Exhibit A. The Immigration Judge granted bond and Petitioner has been released from custody. *Id.*

Providing the Petitioner with the 1226(a) bond hearing, or otherwise releasing them from detention, moots the requested preliminary injunction and this habeas petition more generally.

While Respondents continue to oppose the issuance of a preliminary injunction pursuant to the legal positions stated in the Respondents' brief in opposition to the Petitioners' *ex parte* application for a temporary restraining order, and the Respondents maintain that those positions warrant denying a preliminary injunction on the merits, the issue is mooted in any event by the bond hearing for the Petitioner.

Accordingly, following the provision of the remaining hearings, the OSC re: preliminary injunction should be discharged, and the Petitioners should either voluntarily dismiss their Petition or else be required to respond to an OSC re: Dismissal.

Dated: November 12, 2025

Respectfully submitted,

BILAL A. ESSAYLI
Acting United States Attorney
DAVID M. HARRIS
Assistant United States Attorney
Chief, Civil Division
DANIEL A. BECK
Assistant United States Attorney
Chief, Complex and Defensive Litigation Section

/s/ Sarah L. Cronin
SARAH L. CRONIN
Assistant United States Attorney

Attorneys for Federal Respondents