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9
10 UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 JONATHAN ALEJANDRO NORORIS
13 ESCOBAR,

14 Petitioner,

15 v.

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

18 Respondents.

No. 5:25-cv-02885-MRA-JC

**FEDERAL RESPONDENTS'
RESPONSE TO ORDER TO SHOW
CAUSE RE: PRELIMINARY
INJUNCTION; SUGGESTION OF
MOOTNESS**

Honorable Monica Ramirez Almadani
United States District Judge

RESPONDENTS' OPPOSITION TO OSC RE: PRELIMINARY INJUNCTION

On November 4, 2025, the Court issued an order [Dkt. no. 10] providing that the Respondents are enjoined from continuing to detain the Petitioner unless he is provided a bond hearing before an immigration judge pursuant to 8 U.S.C. § 1226(a) within seven days. The Court's order further required Respondents to show cause as to why a preliminary injunction should not issue. Respondents hereby show such cause.

Petitioner received a bond hearing on November 10, 2025, as shown by the bond hearing schedule notice attached as Exhibit A hereto. By that hearing, the Petitioner was granted release on bond by order of the Immigration Court.

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. *See, e.g., Javier Gonzales et al. v. Kristi Noem et al.*, 5:25-cv-02054-ODW-BFM, Dkt. no. 16 (August 25, 2025 minute order by Hon. Judge Wright, denying as moot the petitioners' pending request for a preliminary injunction given their receipt pursuant to a TRO of 1226(a) bond hearings and issuing the petitioners an order to show cause re: dismissal); Dkt. no. 17 (notice of voluntary dismissal); and Dkt. no. 18 (order dismissing petition). *See also Moises Salomon Zaragoza Mosqueda v. Kristi Noem et al.*, 5:25-cv-002304-CAS-BFM, Dkt. no. 15 (September 17, 2025 minute order by Hon. Judge Snyder, denying preliminary injunction and issuing OSC re dismissal for mootness given the petitioners' receipt of immigration bond hearings); Dkt. no. 16 (notice of voluntary dismissal); *Coc Tut v. Kristi Noem*, 5:25-cv-02701-DOC (October 30, 2025 order denying preliminary injunction as moot and issuing OSC re: dismissal where bond hearings were provided to detainees pursuant to TRO).

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 Petitioner's *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 TRO's issuance and the subsequent provision of the

1 bond hearing for the Petitioner.

2 Accordingly, the OSC re: preliminary injunction should be discharged, and the
3 Petitioner should either voluntarily dismiss their Petition or else be required to respond
4 to an OSC re: Dismissal.

5 Respectfully submitted,

6 Dated: November 11, 2025

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10 /s/ Daniel A. Beck*

11 DANIEL A. BECK
12 Assistant United States Attorney

13 Attorneys for Federal Respondents

14 * The undersigned, counsel of record for the Federal Respondents certifies that this brief
15 contains 4,702 words, which complies with the word limit of L.R. 11-6.1.

EXHIBIT A

IMMIGRATION COURT
10250 RANCHO RD., SUITE 201A
ADELANTO, CA 92301

Avendano Legal
Avendano, Rodrigo Marcelo
6528 Greenleaf Avenue
Suite 108
Whittier, CA 90601

FILE: A 

RE: NORORIS ESCOBAR, JONATHAN ALEJANDRO

NOTICE OF CUSTODY REDETERMINATION HEARING IN IMMIGRATION PROCEEDINGS

PLEASE TAKE NOTE THAT THE ABOVE CAPTIONED CASE HAS BEEN
SCHEDULED/RESCHEDULED FOR A CUSTODY REDETERMINATION HEARING BEFORE THE
IMMIGRATION COURT ON Nov 10, 2025 AT 1:00 P.M. AT THE FOLLOWING ADDRESS:

10250 RANCHO ROAD, COURTROOM 4
ADELANTO, CA 92301

YOU MAY BE REPRESENTED IN THIS PROCEEDING, AT NO EXPENSE TO THE GOVERNMENT, BY
AN ATTORNEY OR OTHER INDIVIDUAL AUTHORIZED AND QUALIFIED TO REPRESENT PERSONS
BEFORE AN IMMIGRATION COURT. IF YOU WISH TO BE REPRESENTED, YOUR ATTORNEY
OR REPRESENTATIVE SHOULD APPEAR WITH YOU AT THIS HEARING.

CERTIFICATION OF SERVICE

THIS DOCUMENT WAS SERVED BY: MAIL [M] PERSONAL SERVICE [P] ELECTRONIC SERVICE [E]
TO: [] ALIEN [] ALIEN c/o Custodial Officer [E] ALIEN's ATT/REP [E] DHS
DATE: 11/5/2025 BY: COURT STAFF: M.NARANJO
Attachments: [] EOIR-33 [] EOIR-28 [] Legal Services List [] Other

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