SCOTT E. BRADFORD, OSB #062824
United States Attorney
District of Oregon
SARAH E. FELDMAN, OSB #141458
Assistant United States Attorney
sarah.feldman@usdoj.gov
1000 SW Third Avenue, Suite 600
Portland, Oregon 97204-2936
Telephone: (503) 727-1000
Attorneys for Respondents

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

ALVARO ESNEL GUZMAN GUZMAN,

Petitioner,

v.

JASON WEISS, Field Office Director, DREW BOSTOCK, Seattle Field Office Director, Immigration and Customs Enforcement and Removal Operations,[1] *et al.*,

Respondents.

Case No. 6:25-cv-02146-MC

RESPONSE TO PETITIONER'S MOTION FOR TEMPORARY RESTRAINING ORDER AND TO PETITION FOR WRIT OF HABEAS CORPUS

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[1] For "core" habeas challenges brought under 28 U.S.C. § 2241, that is, challenges to present physical custody, the only proper respondent is the immediate custodian of the habeas petitioner, "not the Attorney General or some other remote supervisory official." *Rumsfeld v. Padilla,* 542 U.S. 426, 435 (2004). The United States Attorney General, the Acting Director of U.S. Immigration and Customs Enforcement ("ICE"), and the Secretary of the Department of Homeland Security ("DHS") are not proper respondents to this core habeas petition because none of

Respondents hereby respond to Petitioner's petition for writ of habeas corpus ("petition"), ECF No. 1, and motion for temporary restraining order ("TRO"), ECF No. 4. This response is supported by the Declaration of Gary Bautista ("Bautista Decl.") and exhibits.

The Court should deny Petitioner's TRO motion and habeas petition. As an arriving alien/applicant for admission under 8 USC 1225(a)(1), petitioner is subject to mandatory detention pursuant to 8 U.S.C. § 1225(b). Although Petitioner was "paroled" into the United States for a limited period pursuant to 8 USC § 1182(d)(5)(A), his parole expired in November 2024, at which time he was subject to mandatory detention under 8 U.S.C. § 1225(b). Because Congress has mandated detention under §1225(b), Petitioner is not entitled to the relief he currently seeks.

BACKGROUND

I. Legal Background

"Control over immigration is a sovereign prerogative." *El Rescate Legal Servs., Inc. v. Exec. Off. of Immigr. Rev.*, 959 F.2d 742, 750 (9th Cir. 1991). The Immigration and Nationality Act ("INA"), provides the Executive Branch with a comprehensive scheme to administer the immigration system. *See generally* 8 U.S.C. Ch. 12. Among those powers: The President, through the Department of

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those officials has any immediate responsibility for Petitioner's detention. *See id.* at 440 n.13 ("[T]he proper respondent is the person responsible for maintaining—not authorizing—the custody of the prisoner."). Additionally, the current ERO Seattle Acting Field Office Director is Laura Hermosillo.

State and the Department of Homeland Security, decides which noncitizens may enter and remain in the country. *See generally* 8 U.S.C. §§ 1103, 1104.

Petitioner is an applicant for admission who is subject to mandatory detention pursuant to 8 U.S.C. § 1225(b). *See Matter of Yajure Hurado*, 29 I&N Dec. 216 (BIA 2025). Applicants for admission fall into one of two categories. Section 1225(b)(1) covers noncitizens initially determined to be inadmissible due to fraud, misrepresentation, or lack of valid documentation, and certain other aliens designated by the Attorney General in her discretion. Section 1225(b)(2) serves as a catchall provision that applies to all applicants for admission not covered by Section 1225(b)(1) (with specific exceptions not relevant here). *See Jennings v. Rodriguez*, 583 U.S. 281, 287 (2018).

Congress has determined that all aliens subject to section 1225(b) are subject to mandatory detention. Regardless of whether an alien falls under Section 1225(b)(1) or (b)(2), the sole means of release is "temporary parole from § 1225(b) detention 'for urgent humanitarian reasons or significant public benefit,' § 1182(d)(5)(A)." *Jennings*, 583 U.S. at 283.

While all noncitizens detained pursuant to 8 U.S.C. § 1225(b) are subject to mandatory detention, they may be subject to parole by the Attorney General or Department of Homeland Security (DHS), and that is not an issue that the Immigration Judge has authority to consider. *See* 8 U.S.C. § 1182(d)(5)(A); 8 C.F.R. 212.5(a) (2025) (designating who may exercise authority to grant parole); *see also Jennings*, 583 U.S. at 300 (noting that the Attorney General may grant aliens detained under section § 1225(b)(1) temporary parole into the United States "for urgent humanitarian reasons or significant public benefit" (quoting 8 U.S.C. § 1182(d)(5)(A)). This discretionary parole is statutorily required to be "temporary parole" under 8 U.S.C. § 1182(d)(5)(A), and the statute does not grant the Attorney General or DHS the discretion to grant indefinite parole to those subject to mandatory detention.

Federal regulations govern the expiration of parole and state that where the parole has expired, "no written notice shall be required." 8 C.F.R. § 212.5(e)(1) (termination of parole is automatic "at the expiration of the time for which parole was authorized").

II. Factual Background

Petitioner is a native and citizen of Venezuela. Bautista Decl. ¶ 4. On or about November 5, 2023, Petitioner arrived at the Port of Entry at Eagle Pass, Texas, without documents sufficient to enter the United States. *Id.* That same day, Petitioner was paroled into the United States pursuant to 8 U.S.C. § 1182(d)(5)(A)), with a parole expiration date of November 3, 2024. *Id.*, Exhibit ("Ex.") 1. Petitioner also was issued a Notice to Appear ("NTA") on November 5, 2023, alleging that Petitioner is not a citizen or national of the United States, is a native and citizen of Venezuela, applied for admission at Eagle Pass on November 5, 2023, and was not then in possession of a valid entry document. *Id.* ¶ 5, Ex. 2. The NTA charged Petitioner with being an "arriving alien" removable under 8 U.S.C. § 1182(a)(7)(A)(i)(I)).

On or about February 14, 2025, Petitioner filed with the immigration court a Form I-589, Application for Asylum and for Withholding of Removal, in which he admitted to being a native and citizen of Venezuela.[2] *Id.* ¶ 6. Petitioner's first immigration hearing currently is scheduled for October 25, 2027.[3] *Id.* ¶ 8.

On or about November 19, 2025, DHS officers in the vicinity of Eugene, Oregon, were running the license plates of vehicles they encountered in an indiscriminate manner. ¶ 7. DHS officers conducted a traffic stop on Petitioner's vehicle in Eugene, Oregon after running his license plate against government databases, which showed that Petitioner was in the United States illegally and had failed to notify DHS of his address change. *Id.* During the encounter, Petitioner admitted to being a citizen of Venezuela without authorization to be in the United States. *Id.* A supervisor on the scene signed an arrest warrant and Petitioner was taken into DHS custody and transferred to the Northwest ICE Processing Center. *Id.*

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[2] In general, asylum applications must be filed within one year of the alien's arrival in the United States. *See* 8 U.S.C. § 1158(a)(2)(B); 8 C.F.R. § 1208.4(a)(2).

[3] Undersigned counsel has been advised that a motion to change venue from the Dallas immigration court to the Tacoma immigration court will be filed imminently. Counsel will provide this Court a copy of the motion when it is filed, if the Court requests it. Undersigned counsel has also been advised that the change of venue will cause the immigration court to set a new hearing date, and that the hearing will be expedited since the matter will now be on the detained docket.

ARGUMENT

I. The Court should deny Petitioner's habeas petition.

A. Legal Standard

"The district courts of the United States . . . are courts of limited jurisdiction. They possess only that power authorized by Constitution and statute[.]" *Exxon Mobil Corp. v. Allapattah Servs., Inc.*, 545 U.S. 546, 552 (2005) (internal quotations omitted). Title 28 U.S.C. § 2241 provides district courts with jurisdiction to hear federal habeas petitions. "[T]he scope of habeas has been tightly regulated by statute, from the Judiciary Act of 1789 to the present day[.]" *Dep't of Homeland Sec. v. Thuraissigiam*, 591 U.S. 103, 125 n.20 (2020). To obtain habeas relief, Petitioner must prove that his custody violates the Constitution, laws, or treaties of the United States. 28 U.S.C. § 2241(c)(3).

B. Petitioner's detention is lawful under 8 U.S.C. § 1225(b).

In this case, ICE lawfully detained Petitioner pursuant to 8 U.S.C. § 1225(b). Aliens who are encountered shortly after illegally crossing the border and who are determined to be inadmissible due to lacking a visa or valid entry documentation, 8 U.S.C. § 1182(a)(7)(A), may be removed pursuant to an expedited removal order unless they express an intention to apply for asylum or a fear of persecution in their home country. 8 U.S.C. §§ 1225(b)(1)(A)(i), (iii)(II). "The purpose of these provisions is to expedite the removal from the United States of aliens who indisputably have no authorization to be admitted to the United States, while providing an opportunity for such an alien who claims asylum to have the merits of his or her claim promptly assessed by officers with full professional training in adjudicating asylum claims." H.R. Conf. Rep. No. 828, 104th Cong., 2d Sess. 209 (1996). Applicants for admission fall into one of two categories. Section 1225(b)(1) covers aliens initially determined to be inadmissible due to fraud, misrepresentation, or lack of valid documentation, and certain other aliens designated by the Attorney General in her discretion. Section 1225(b)(2) serves as a catchall provision that applies to all applicants for admission not covered by Section 1225(b)(1) (with specific exceptions not relevant here). *See Jennings v. Rodriguez*, 583 U.S. 281, 287 (2018). Congress has determined that all aliens subject to Section 1225(b) are subject to mandatory detention. Regardless of whether an alien falls under Section 1225(b)(1) or (b)(2), the sole means of release is "temporary parole from § 1225(b) detention 'for urgent humanitarian reasons or significant public benefit,' § 1182(d)(5)(A)." *Jennings*, 583 U.S. at 283.[4]

Petitioner in this case is an "applicant for admission" under § 1225(a), and therefore is subject to detention under § 1225(b).[5] Except for a limited exception not

[4] In *Y-Z-L-H v. Bostock*, 792 F. Supp. 3d 1123 (D. Or. 2025), the court explained the parole process in immigration cases. In that case, the petitioner's parole was revoked prior to its expiration and petitioner was detained. The court held that, before parole may be revoked, the parolee must be given written notice with the reasons supporting the revocation decision. Here, Petitioner's parole was not revoked but rather expired after one year. Petitioner's detention following the expiration of parole was lawful.

[5] An applicant for admission is "[a]n alien present in the United States who has not been admitted or who arrives in the United States (whether or not at a designated port of arrival and including an alien who is brought to the United States after

applicable here, detention under § 1225 is mandatory for an applicant for admission (also referred to as an arriving alien). *Jennings*, 583 U.S. at 297. Additionally, individuals are not entitled to a bond hearing. *Id.* ("[N]either § 1225(b)(1) nor § 1225(b)(2) says anything whatsoever about bond hearings.").

As an applicant for admission, Petitioner was paroled for a one-year duration pursuant to 8 U.S.C. § 1182(d)(5)(A). Parole does not place the alien "within the United States." *Leng May Ma v. Barber*, 357 U.S. 185, 190 (1958). An alien who has been paroled into the United States "is not . . . 'in' this country for purposes of immigration law . . . ." *Matter of Abebe*, 16 I&N Dec. 171, 173 (BIA 1976). Following the expiration of parole, the alien will continue to be treated as an applicant for admission subject to mandatory detention. *See* 8 C.F.R. § 1.2.[6]

Petitioner's detention here under Section 1225(b) without a pre-detention hearing was thus lawful. The fact that Petitioner had initially been released by ICE on parole does not change this fact. ICE's authority to detain in this instance is not limited to circumstances where a material change in circumstances has occurred. Instead, Petitioner was an applicant for admission subject to mandatory detention.

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having been interdicted in international or United States waters) shall be deemed for purposes of this chapter an applicant for admission." 8 USC 1225(a)(1).

[6] "Arriving alien means an applicant for admission coming or attempting to come into the United States at a port-of-entry, or an alien seeking transit through the United States at a port-of-entry, or an alien interdicted in international or United States waters and brought into the United States by any means, whether or not to a designated port-of-entry, and regardless of the means of transport. An arriving alien remains an arriving alien even if paroled pursuant to section 212(d)(5) of the Act, and even after any such parole is terminated or revoked."

Petitioner was granted discretionary parole. At the time of his arrest, Petitioner's parole expired. Petitioner was therefore subject to detention under Section 1225(b). His detention is lawful. An Immigration Judge will not have jurisdiction to grant a custody redetermination because Petitioner's custody is mandatory.

Accordingly, the Court should deny the Petition.

C. Petitioner's detention comports with due process.

1. Petitioner's detention comports with substantive due process.

ICE has a legitimate interest in Petitioner's detention. For more than a century, the immigration laws have authorized immigration officials to charge aliens as removable from the country, to arrest aliens subject to removal, and to detain aliens for removal proceedings. *See Demore v. Kim*, 538 U.S. 510, 523–26 (2003); *Abel v. United States*, 362 U.S. 217, 232–37 (1960) (discussing longstanding administrative arrest procedures in deportation cases). "Detention during removal proceedings is a constitutionally valid aspect of the deportation process." *Velasco Lopez v. Decker*, 978 F.3d 842, 848 (2d Cir. 2020) (citing *Demore*, 538 U.S. at 523); *Carlson v. Landon*, 342 U.S. 524, 538 (1952) ("Detention is necessarily a part of [the] deportation procedure.").

Congress has determined that all aliens subject to Section 1225(b) are subject to mandatory detention. Regardless of whether an alien falls under Section 1225(b)(1) or (b)(2), the sole means of release is "temporary parole from § 1225(b) detention 'for urgent humanitarian reasons or significant public benefit,' § 1182(d)(5)(A)." *Jennings*, 583 U.S. at 283.

Further, several provisions at 8 U.S.C. § 1252 preclude review. First, 8 U.S.C. § 1252(g) bars review of Petitioners' claims because they arise from the government's decision to commence removal proceedings. Second, 8 U.S.C. § 1252(b)(9) bars the Court from hearing Petitioners' claims because they the decision and action to detain Petitioner, which arises from the government's decision to commence removal proceedings, thus an "action taken . . . to remove an alien from the United States." Third, 8 U.S.C. § 1252(e)(3) applies and limits "[j]udicial review of determinations under section 1225(b) of this title and its implementation." The plain language of the statute precludes judicial review for aliens determined to be detained pursuant to Section 1225(b)(2) and applies to a "determination under section 1225(b)" and to its implementation.

Petitioner's detention here under Section 1225(b) without a pre-detention hearing was thus lawful. Petitioner was paroled for a one-year period and subject to mandatory detention thereafter. Petitioner had notice that his parole would expire on November 3, 2024. The fact that ICE made an initial determination that Petitioner could be released on parole does not prevent ICE from later detaining Petitioner after the parole had expired.

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2. *Petitioner's detention comports with procedural due process.*

"Due process is flexible and calls for such procedural protections as the particular situation demands." *Mathews v. Eldridge*, 424 U.S. 319, 334 (1976). Under *Mathews*, "[t]he fundamental requirement of due process is the opportunity to be heard at a meaningful time and in a meaningful manner." *Id.*, at 333 (internal quotation marks omitted). This calls for an analysis of (1) "the private interest that will be affected by the official action," (2) "the risk of an erroneous deprivation of such interest through the procedures used, and probable value, if any, of additional or substitute procedural safeguards," and (3) the Government's interest. Id., at 334–35.

Respondents recognize the "weighty liberty interests implicated by the Government's detention of noncitizens." *Reyes v. King*, No. 19-cv-8674, 2021 WL 3727614, at *11 (S.D.N.Y. Aug. 20, 2021). However, Petitioner does not have a liberty interest in participating in parole, nor does he have a liberty interest in a continuation of parole past the valid expiration date.

"The recognized liberty interests of U.S. citizens and aliens are not coextensive: the Supreme Court has 'firmly and repeatedly endorsed the proposition that Congress may make rules as to aliens that would be unacceptable if applied to citizens.'" *Rodriguez Diaz*, 53 F.4th 1189, 1206 (9th Cir. 2022) (quoting *Demore v. Kim*, 538 U.S. 510, 522 (2003)). As the Supreme Court has explained, "[i]n the exercise of its broad power over naturalization and immigration, Congress regularly makes rules that would be unacceptable if applied to citizens." *Mathews v. Diaz*, 426 U.S. 67, 79-80 (1976). Indeed, the Supreme Court has repeatedly "recognized detention during deportation proceedings as a constitutionally valid aspect of the deportation process." *Demore*, 538 U.S. at 523. Petitioner's release and parole into the country was always subject to the expiration of his parole. Petitioner cannot claim that the government promised him ongoing release from mandatory detention.

Second, the risk of a constitutionally significant deprivation of Petitioner's liberty here is minimal. Noncitizens have no right to a hearing before an immigration judge under Section 1225(b). Likewise, there is no requirement for such a hearing before re-detention after the expiration of parole. The Supreme Court has warned courts against reading additional procedural requirements into the INA. *See Johnson v. Arteaga-Martinez*, 596 U.S. 573, 582 (2022) (declining to read a specific bond hearing requirement into 8 U.S.C. § 1231(a)(6) because "reviewing courts . . . are generally not free to impose [additional procedural rights] if the agencies have not chosen to grant them") (quoting *Vermont Yankee Nuclear Power Corp. v. Natural Resources Defense Council, Inc.*, 435 U.S. 519, 524 (1978) (cleaned up)). Petitioner was released on parole for a defined period of one-year. No additional procedural requirements were required to detain Petitioner following the expiration of parole.

Turning to the third *Mathews* factor, the Ninth Circuit has emphasized that the *Mathews* test "must account for the heightened government interest in the immigration detention context." *Rodriguez Diaz*, 53 F.4th at 1206. The Ninth Circuit in *Rodriguez Diaz* recognized that "the government clearly has a strong interest in preventing aliens from 'remain[ing] in the United States in violation of our law.'" *Rodriguez Diaz*, 53 F.4th at 1208 (quoting *Demore*, 538 U.S. at 518). Here, the government has an interest in enforcing the detention provisions of section 1225(b) and has an interest in detaining individuals subject to mandatory detention.

Petitioner's detention comports with due process, and the Court should deny the habeas petition.

II. The Court should deny Petitioner's TRO motion.

A. Legal Standard

The standards for a TRO and a preliminary injunction are "substantially identical." *Stuhlbarg Int'l Sales Co. v. John D. Brush & Co.*, 240 F.3d 832, 839 n.7 (9th Cir. 2001). A preliminary injunction is an "extraordinary and drastic remedy." *Munaf v. Geren*, 553 U.S. 674, 689 (2008). "To obtain a preliminary injunction, a plaintiff must establish (1) a likelihood of success on the merits, (2) a likelihood of irreparable harm in the absence of preliminary relief, (3) that the balance of equities favors the plaintiff, and (4) that an injunction is in the public interest." *Geo Group, Inc. v. Newsom*, 50 F.4th 745, 753 (9th Cir. 2022) (en banc) (citing *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 20 (2008)). To carry the burden of persuasion, the moving party must make a "clear showing" on each of these four required elements. *Lopez v. Brewer*, 680 F.3d 1068, 1072 (9th Cir. 2012) (quoting *Mazurek v. Armstrong*, 520 U.S. 968, 972 (1997)).

Because Petitioner here seeks a mandatory injunction, his burden is "doubly demanding." *Garcia v. Google, Inc.*, 786 F.3d 733, 740 (9th Cir. 2015). To succeed, he "must establish that the law and facts *clearly favor*" his position, "not simply that []he is likely to succeed." *Id.* (emphasis in original). Further, a mandatory injunction "is particularly disfavored" and may not be granted "unless extreme or very serious damage will result." *Marlyn Nutraceuticals, Inc. v. Mucos Pharma GmbH & Co.*, 571 F.3d 873, 879 (9th Cir. 2009) (cleaned up).

B. The Court should deny Petitioner's motion because it improperly seeks final relief.

As a threshold matter, this Court should deny a TRO because the requested order—immediate release from custody—goes well beyond maintaining the status quo pending a determination on the merits. The requested TRO improperly seeks the ultimate relief Petitioner demands in his habeas petition.

The appropriate purpose of emergency equity "is to preserve the status quo and the rights of the parties until a final judgment issues in the cause." *U.S. Philips Corp. v. KBC Bank N.V.*, 590 F.3d 1091, 1094 (9th Cir. 2010). A preliminary injunction or TRO may not be used to obtain "a preliminary adjudication on the merits," but only to preserve the status quo pending final judgment. *Sierra On-Line, Inc. v. Phoenix Software, Inc.*, 739 F.2d 1415, 1422 (9th Cir. 1984).

Petitioner's habeas petition seeks to halt his detention. *See* ECF No. 1, Prayer for Relief (d). Petitioner seeks the same relief in his TRO motion. *See* ECF No. 2. In seeking ultimate habeas relief in a TRO motion, Petitioner would circumvent the habeas proceeding. The Ninth Circuit has firmly rejected this approach, concluding that "judgment on the merits in the guise of preliminary relief is a highly inappropriate result." *Senate of Cal. v. Mosbacher*, 968 F.2d 974, 978 (9th Cir. 1992); *see also Doe v. Bostock*, No. 24-326-JLR-SKV, 2024 WL 2861675, *2 (W.D. Wash. June 6, 2024). Accordingly, Petitioner's TRO motion should be denied.

C. Petitioner makes no showing of irreparable harm.

To obtain a TRO, a party "must establish" that he is "likely to suffer irreparable harm in the absence of preliminary relief." *Winter*, 555 U.S. at 20. To do so, the party must make a "showing on the facts" of the case and cannot rely on unsubstantiated argument and presumption. *Flexible Lifeline Sys., Inc. v. Precision Lift, Inc.*, 654 F.3d 989, 998 (9th Cir. 2011); *see also Ovitsky v. Oregon*, No. 3:12-cv-02250-AA, 2013 WL 5253162, at *3 (D. Or. Sept. 16, 2013) (denying relief where plaintiff did not provide evidence of irreparable harm).

Petitioner makes no showing of a likelihood of irreparable harm. Petitioner's detention is lawful. Although Petitioner speculates that he may be transferred to a remote detention center outside of the United States, Pet. Mot. at 3, showing a "possibility" of irreparable harm is insufficient for such relief. *See Winter*, 555 U.S. at 22. The TRO motion fails to establish that Petitioner faces any harm other than the fact of his continued detention, which is a harm that all habeas petitioners face.

Petitioner may believe that he will be irreparably harmed by his detention, but this does not satisfy the inquiry for mandatory injunctive relief. It only "begs the constitutional questions presented in [his] petition by assuming that [P]etitioner has suffered a constitutional injury." *Cortez v. Nielsen*, No. 19-754-PJH, 2019 WL 1508458, at *3 (N.D. Cal. Apr. 5, 2019).

Petitioner remains subject to removal proceedings. In those proceedings, Petitioner will have the right to assert claims for immigration relief. Petitioner will have the right to appeal an unfavorable immigration-judge decision to the Board of Immigration Appeals ("BIA"), and there are regulatory stay provisions that prevent execution of an immigration-judge decision in the context of a BIA appeal. 8 C.F.R. § 1003.6(a).

For these reasons, this Court should deny the TRO motion.

D. Petitioner establishes no likelihood of success on the merits.

This Court should deny Petitioner's motion, in addition, because he fails to establish a likelihood of success on the merits of his habeas petition, as explained above. ICE acted within its lawful authority to detain Petitioner following the expiration of his parole. Petitioner's detention is mandatory pursuant to 8 U.S.C. § 1225(b). Petitioner's detention violates neither the INA nor the Administrative Procedure Act ("APA"). It also comports with due process because Petitioner was detained after the expiration of his parole.

To the extent Petitioner challenges the stop itself, such allegations do not form the basis for habeas relief. Moreover, the stop was proper where the officers were running license plates in an indiscriminate manner and found that Petitioner was in the country illegally and had failed to notify DHS of his address change. Bautista Decl. ¶ 7.

For these reasons, this Court should deny the TRO motion.

E. The balance of equities and the public interest disfavor a TRO.

This Court should also deny Petitioner's motion because the balance of equities and the public interest disfavor a TRO. The balance of equities and the public interest factors "merge when the Government is the opposing party." *Nken v. Holder*, 556 U.S. 418, 435 (2009). Courts "should pay particular regard for the public consequences in employing the extraordinary remedy of injunction." *Weinberger v. Romero-Barcelo*, 456 U.S. 305, 312 (1982). The public interest in enforcement of the United States' immigration laws is significant. *See, e.g.*, *United States v. Martinez-Fuerte*, 428 U.S. 543, 556-58 (1976); *Blackie's House of Beef, Inc. v. Castillo*, 659 F.2d 1211, 1221 (D.C. Cir. 1981) ("The Supreme Court has recognized that the public interest in enforcement of the immigration laws is significant.") (citing cases).

Accordingly, the Court should deny the TRO motion.

CONCLUSION

For the foregoing reasons, the Court should deny Petitioner's TRO motion and deny his petition for habeas relief.

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Respectfully submitted this 25th day of November, 2025.

SCOTT E. BRADFORD
United States Attorney
District of Oregon

/s/ Sarah E. Feldman
SARAH E. FELDMAN
Assistant U.S. Attorney
Attorneys for Respondents