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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

KAROLAINÉ MONTEIRO DE SOUZA,

Petitioner,

v.

TIMOTHY ROBBINS ET AL.,

Respondents.

CASE NO. 1:25-CV-01597-DJC-JDP

GOVERNMENT'S OPPOSITION TO MOTION
FOR TEMPORARY RETRAINING ORDER

The Petitioner, Karolaine Monteiro De Souza, does not meet her burden to show a basis for a Temporary Restraining Order ("TRO"). Ms. De Souza is admittedly an alien from Brazil who entered the United States illegally late last year. *See* Dkt. 2. She is then an "applicant for admission" who is subject to mandatory detention by ICE under 8 U.S.C. § 1225(b)(2)(A). *See, generally, Cortes Alonzo v. Noem et al.*, 1:25-cv-01519-WBS-SCR at Dkt. 14 (E.D. Cal. Nov. 17, 2025); *Ramos v. Lyons et al.*, 2:25-cv-09785-SVW-AJR at Dkt. 8 (C.D. Cal. Nov. 12, 2025). She is also not entitled to a bond hearing for these same reasons. *Id.*

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1 Therefore, Ms. De Souza cannot show a likelihood of success on the merits and her request for a TRO
2 should be denied without a hearing.¹

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4 Dated: November 21, 2025

ERIC GRANT
United States Attorney

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6 By: /s/ Joseph Barton
Joseph Barton
Assistant United States Attorney
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27 ¹ Ms. De Souza appears to have been previously released by ICE under 8 U.S.C. § 1226 *et seq.*
28 *See* Dkt. 2. Assuming that is true, the government recognizes that some judges in this District have
granted TROs like the one that she requests, at least in part, on that basis.