

1 Jose F. Vergara 251342
2 Law Office of Jose F. Vergara
3 1990 North California Blvd., 8th Floor
4 Walnut Creek, CA 94596
5 Telephone: (925) 457-2090

6 Attorney for Petitioner
7 Karolaine Monteiro De Souza
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10 **UNITED STATES DISTRICT COURT**
11 **EASTERN DISTRICT OF CALIFORNIA**
12

13 KAROLAINA MONTEIRO DE SOUZA

14 *Petitioner,*

15 v.

16 Timothy S. ROBBINS, Field Office Director of the
17 Los Angeles Field Office of U.S. Immigration and
18 Customs enforcement; Todd M. LYONS, Acting
19 Director of U.S. Immigration and Customs
20 Enforcement; U.S. DEPARTMENT OF
21 HOMELAND SECURITY, Kristi NOEM,
22 Secretary of the U.S. Department of Homeland
Security, Christopher CHESTNUT, Warden,
California City Corrections Center, and Pamela
BONDI, Attorney General of the United States

23 *Respondents,*
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Case No. 1:25-CV-01597-DJC-JDP

**PETITIONER'S REPLY TO
RESPONDENTS RESPONSE TO ORDER
TO SHOW CAUSE WHY
PRELIMINARY INJUNCTION SHOULD
NOT ISSUE ON SAME TERM AS THE
TEMPORARY RESTRAINING ORDER**

REPLY

For the reasons set forth in Petitioner's Petition for Writ of Habeas Corpus (Dkt. 1); Petitioner's Motion For a Temporary Restraining Order (Dkt. 2), and the analysis made by this Court in its Temporary Restraining Order (Dkt. 10), Petitioner believes this Court should issue a preliminary injunction. Petitioner hereby submit on her pleadings.

Respectfully submitted,

DATE: 12/03/2025

/S/ Jose F. Vergara

Jose F. Vergara
CA Bar No. 251342
vergarajf@hotmail.com

COUNSEL FOR PETITIONER

WORD COUNT CERTIFICATION

I certify that this memorandum contains 208 words, in compliance with the Local Civil Rules.

/S/ Jose F. Vergara

Jose F. Vergara

CA Bar No. 251342

vergarajf@hotmail.com

COUNSEL FOR PETITIONER