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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

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11 WILSON OMAR PAZ AGUILERA,
12 Petitioner,
13 v.
14 SERGIO ALBARRAN, ET AL.,
15 Respondents.

CASE NO. 1:25-CV-01619-JLT-SAB
RESPONSE TO MINUTE ORDER RE FILING
EXHIBITS

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18 On November 30, 2025, the Court issued an order directing the United States to file copies of all
19 documents relied on by Deportation Officer Patrick Cruz in his sworn declaration previously submitted
20 in support of the United States' opposition to Wilson Omar Paz Aguilera's motion for a temporary
21 restraining order. Min. Order, Dkt. No. 13. The Court ordered such a response to be filed by 3:00 p.m.
22 on December 1, 2025. *Id.* Following a diligent search of immigration records requested by the United
23 States Attorney's Office, the United States respectfully submits this response to the Court's minute
24 order. As part of that response, the United States attaches relevant documents located in Paz-Aguilera's
25 alien file (commonly referred to as an "A-file"):

26 1. Attached as Exhibit 1 is an Order of Release on Recognizance issued to Paz Aguilera in
27 April 2019, following his encounter by immigration authorities that year. *See* Decl. of Deportation
28 Officer Patrick Cruz ¶ 8, Dkt. No. 11-1.

1 2. Attached as Exhibit 2 is a Form I-213 detailing the circumstances of immigration
2 authorities' encounter with Paz Aguilera in 2019. *See id.*

3 3. Attached as Exhibit 3 is a Notice to Appear from July 2024 charging Paz Aguilera with
4 being a removable alien. *See id.* ¶ 12.

5 According to information provided to the United States Attorney's Office by immigration
6 personnel in San Francisco, there are no documents in Paz Aguilera's A-file independently
7 substantiating his violation of release on recognizance. *See id.* ¶ 14 (describing Paz Aguilera's failure to
8 "complete a biometric check-in" on June 6, 2025). Instead, documentation of that violation consists of
9 notations made by immigration authorities in government law enforcement databases, and these
10 notations provide no additional detail about the relevant violation than what is already described in
11 Officer Cruz's declaration. *See id.* ("Petitioner violated the terms of his release. On June 6, 2025,
12 Petitioner failed to complete a biometric check-in. The same day, an ISAP officer had to contact the
13 Petitioner and ask him to comply with his check-in requirements.").

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15 Dated: December 1, 2025

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17 By: /s/ SAM STEFANKI
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