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6 Attorneys for Respondents

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

10 CARMEN GUACHIAK CHOX.,

11 Petitioner,

12 v.

13 TIMOTHY S. ROBBINS, ET AL.,

14 Respondents.

CASE NO. 1:25-CV-001648-KES-HBK

RESPONDENT'S SUPPLEMENTAL BRIEFING
ON PETITION AND MOTION FOR ABEYANCE

DATE:

TIME:

COURT: Hon. Kirk E. Sheriff

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16 On December 8, 2025, this Court granted Petitioner's motion for a preliminary injunction and
17 ordered respondents to release petitioner immediately. In addition, the Court granted that Respondents
18 "may file an additional brief related to the merits of the petition" within 30 days of the Court Order.

19 Respondents do not have additional law or briefing to present to the Court at this time.
20 However, Respondents request that this matter be held in abeyance pending the resolution of a pending
21 Ninth Circuit appeal in the case of *Rodriguez v. Bostock*, 779 F.Supp.3d 1239 (W.D. Wash. 2025), Ninth
22 Circuit docket no. 25-6842. The issues raised in *Rodriguez* are substantially similar to those raised by
23 Petitioner, and the Ninth Circuit decision will likely be dispositive as to the issues briefed by Petitioner.

24 Should this Court decline to hold the matter in abeyance, Respondents rely upon previous filings,
25 waive the right to a hearing, and request the Court rule based upon the prior submissions.

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Dated: January 7, 2026

ERIC GRANT
United States Attorney

By: /s/ JESSICA DELANEY
JESSICA DELANEY
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