

1 ERIC GRANT
United States Attorney
2 BRODIE M. BUTLAND
Assistant United States Attorney
3 2500 Tulare Street, Suite 4401
4 Fresno, CA 93721
Tel: (559) 497-4021
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6 Attorneys for Respondents

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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

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11 JOSE OSVALDO FERREIRA JUNIOR,

12 Petitioner,

13 v.

14 TIMOTHY S. ROBBINS,

15 Respondents.
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CASE NO. 1:25-CV-1671-DC-DMC

**RESPONDENTS' RESPONSE TO ORDER TO
SHOW CAUSE**

17 Respondents respectfully submit its response to the Court's Order to Show Cause issued on
18 February 17, 2026 (ECF 16), with apologies to the Court. The Order to Show Cause was inadvertently
19 missed because Respondents' counsel, William Dean Carter, has been out on paternity leave since
20 January 2026. Mr. Carter first learned of the Order to Show Cause today. Respondents respectfully
21 request that the Court discharge its Order to Show Cause due to this filing.

22 In response to the Order to Show Cause, Respondents respectfully request that the Court deem
23 their Opposition to Petitioner's Motion for Temporary Restraining Order (ECF 13) to be their response
24 to the habeas petition. Respondents' legal position on the habeas petition is the same as that in the
25 earlier Opposition. Respondents further note that the Fifth Circuit recently agreed with its legal position
26 as to the applicability of 8 U.S.C. § 1225(b) in *Buenrostro-Mendez v. Bondi*, -- F.4th --, 2026 WL
27 323330 (5th Cir. Feb. 6, 2026), and they respectfully submit that the Court should follow the reasoning
28 of that decision.

1 Respondents further confirm that Petitioner was released from confinement on December 10,
2 2025, in accordance with the Court's Order. ECF 14. Petitioner has not been re-detained since his
3 release.

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5 Dated: February 27, 2026

ERIC GRANT
United States Attorney

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7 By: /s/ Brodie M. Butland
8 BRODIE M. BUTLAND
Assistant United States Attorney
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