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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
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11 CRISTIAN AMAYA-QUINTEROS,  
12  
13 Petitioner,  
14 v.  
15 CORECIVIC, INC., ET AL.  
16 Respondents.

CASE NO. 1:25-CV-01672-AC

RESPONDENTS' REPLY IN SUPPORT OF  
MOTION FOR RECONSIDERATION OR  
CLARIFICATION

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18 On January 9, 2026, Respondents submitted a motion for reconsideration or clarification  
19 focusing only on the portion of the Court's order and preliminary injunction requiring Respondents to  
20 turn Petitioner's entire A-File over to Petitioner's counsel. ECF 33. Petitioner timely filed opposition,  
21 arguing he is entitled to his entire A-file through these habeas proceedings. ECF 35. Respondents now  
22 submit their reply in support of the motion for reconsideration.

23 In his opposition, Petitioner relies on the Ninth Circuit's holding in *Dent v. Holder*, 627  
24 F.3d 365 (9th Cir. 2010), which held that an alien litigating his removal, and having a statutory right to  
25 A-File under 8 U.S.C. § 1229a, should have been given access to his records. However, this case is not  
26 an appeal of Petitioner's immigration matter as it proceeds before an Immigration Judge, nor is this  
27 court considering the validity of Petitioner's immigration claims. See *Singh v. Holder*, 638 F.3d 1196,  
28 1210 (9th Cir. 2011) (holding that habeas petitioners could challenge immigration detention, but courts

1 lacked jurisdiction to review the merits of immigration proceedings through habeas proceedings).  
2 Petitioner asks only that he not be subject to detention pending the resolution of his proceedings. He  
3 cannot seek to bolster or challenge the merits of his immigration case before this court. *Id.* Therefore,  
4 Petitioner's demand for files related to his claims related to human trafficking and alien smuggling (ECF  
5 35 at 1), are not proper bases for this court to order production of the A-file in this habeas proceeding,  
6 since those issues relate to the merits of his removal proceedings case, rather than his detention or  
7 release pending the outcome of his removal proceedings.

8 Here, unlike in the removal proceedings focused on in *Dent*, there is no statutory right to  
9 Petitioner's A-file in this habeas proceeding, meaning the FOIA process controls by default. *Dent*, 627  
10 F.3d at 374. Petitioner may request his A-file through FOIA, for use in this matter or his underlying  
11 removal proceedings. Respondents do not oppose any stay of these proceedings pending the production  
12 of Petitioner's A-file through FOIA.

13 Because Petitioner has adequate statutory mechanisms to obtain his file, because there is no right  
14 to the discovery of that file in this habeas action, because Respondents have diligently provided  
15 documents responsive to the claims in this habeas petition, and because no other statute compels the  
16 production of the A-file, there is affront to due process in proceeding on the record now before the court  
17 or requiring Petitioner to use the FOIA process to obtain a copy of his A-file. For these reasons,  
18 Respondents request the court reconsider the portion of its order compelling production of the entire A-  
19 file.

20  
21 Dated: January 21, 2026

ERIC GRANT  
United States Attorney

23 /s/ J. Douglas Harman  
24 J. DOUGLAS HARMAN  
25 Assistant United States Attorney  
26 Attorney for Respondents  
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