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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

F.V.A.V.,

Petitioner,

v.

Minga WOFFORD, et. al.

Respondents.

No. 1:25-cv-01763-TLN-JDP

**RESPONDENTS' REQUEST TO
APPEAR REMOTELY VIA ZOOM AT
THE HEARING ON DECEMBER 17,
2025, AT 10:30 A.M.**

Petitioner hereby requests leave to appear remotely via Zoom at the hearing to show cause why a Temporary Restraining Order ("TRO") should not issue pending final disposition, which is scheduled for **December 17, 2025, at 10:30 am.** (ECF 9).

Petitioner acknowledges the Court's standing order requiring that any motion for remote appearance be filed at least one week before the hearing date. As this motion is being submitted within the required timeframe, Petitioner respectfully requests that the Court grant this request, based on the attached declaration of undersigned counsel.

Dated: December 10, 2025

By counsel,

s/ Natalia Vieira Santanna
Natalia Vieira Santanna

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2 **DECLARATION**

3 I, Natalia Vieira Santanna, declare the following:

- 4 1. I am counsel for petitioner. I am familiar with the facts described below.
- 5 2. On December 8, 2025, Petitioner F.V.A.V. filed an *Ex Parte* Motion for Temporary Restraining
6 Order ("TRO") and Motion for Preliminary Injunction in their habeas corpus case. (ECF No. 7.)
7 Petitioner also filed a Motion to Proceed Via Pseudonym. (ECF No. 3.). On that same date, Chief
8 District Judge Troy L. Nunley issued an order setting a hearing, *inter alia*, on **Wednesday, December**
9 **17, 2025, at 10:30 a.m.** in Courtroom 2 before Chief District Judge Troy L. Nunley.
- 10 3. Undersigned counsel respectfully submits that this Court, in adopting its Local Rule guiding remote
11 hearings, recognized that physical travel to the hearing may be arduous. As to the undersigned counsel's
12 schedule for the relevant period, the undersigned counsel has substantial time constraints from
13 previously scheduled travel and her regular caseload. Undertaking the travel would cause the
14 undersigned counsel to be impaired and constrained in the ability to meet deadlines and hearings
15 currently set in other matters.
- 16 4. On December 10, 2025, the undersigned emailed the U.S. Attorney's Office habeas unit requesting
17 their position as to undersigned counsel appearing remotely via Zoom. Counsel for Respondent has no
18 objection to undersigned counsel appearing remotely.
- 19 5. For the reasons stated herein, undersigned counsel asks this Court for leave to appear remotely via
20 Zoom for the hearing on **December 17, 2025**, regarding Petitioner's TRO. Undersigned counsel submits
21 that allowing a remote appearance will alleviate administrative burdens, time constraints, and otherwise
22 allow undersigned counsel to prepare while endeavoring to meet other deadlines properly.
6. Dated: December 10, 2025

By counsel,

s/ Natalia Vieira Santanna
Natalia Vieira Santanna