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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

Jahaira Abigail Tenorio Rugama

Petitioner,

v.

Christopher CHESTNUT, Warden,
California City Detention Center;

Todd M. LYONS, Acting Director,
Immigration and Customs Enforcement, U.S.
Department of Homeland Security;

Kristi NOEM, in her Official Capacity,
Secretary, U.S. Department of Homeland
Security; and

Pam BONDI, in her Official Capacity,
Attorney General of the United States;

Respondents - Defendants,

CASE NO.: 1:25-CV-01918-DJC-AC

PETITIONER'S REPLY TO
RESPONDENT'S RESPONSE TO ORDER
TO SHOW CAUSE

**PETITIONER'S REPLY TO RESPONDENT'S RESPONSE
TO ORDER TO SHOW CAUSE**

Petitioner, Jahaira Abigail Tenorio Rugama, ("Ms. Tenorio Rugama"), respectfully submits this Reply to Respondent's Response to the Court's December 18, 2025 minute order ordering Respondent's to show cause as to whether there are any factual or legal issues in this case that render it distinct from the Court's prior orders in the cases listed that would justify a denial of a preliminary injunction.

We agree with the Respondents that the factual and legal issues in this matter are similar to the cases cited in the Order to Show Cause.

We respectfully request immediate release as the government has shown no legal authority to continue to hold Jahaira Abigail Tenorio Rugama pending a prolonged Ninth Circuit Appeal that could result in continued irreparable harm to Petitioner.

Date: December 22, 2025

Respectfully Submitted,

/s/ Robert Beles

Robert Beles

Attorney For Petitioner

Jahaira Abigail Tenorio Rugama

VERIFICATION PURSUANT TO 28 U.S.C. 2242

I am submitting this verification on behalf of the Petitioner because I am one of Petitioner's attorneys. I have discussed the events described in the Petition with the Petitioner. Based on those discussions, I hereby verify that the factual statements made in the attached Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Executed on December 22, 2025, in Oakland, CA.

/s/ Robert Beles

Robert Beles

Attorney For Petitioner

Jahaira Abigail Tenorio Rugama