

1 ERIC GRANT
United States Attorney
2 JOSEPH D. BARTON
Assistant United States Attorney
3 2500 Tulare Street, Suite 4401
Fresno, CA 93721
4 Telephone: (559) 497-4000
Facsimile: (559) 497-4099
5

6 Attorneys for Plaintiff
United States of America
7

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 LADY ALEXANDRA
BELALCAZAR ARCOS,

12 Petitioner,

13 v.

14 CORE CIVIC INC. ET AL.,

15 Respondents.
16

CASE NO. 1:25-CV-01930-DC-DMC

GOVERNMENT'S OPPOSITION TO
PETITIONER'S MOTION FOR TEMPORARY
RESTRAINING ORDER

17 The Petitioner does not meet her burden. She is admittedly an alien who entered the United
18 States illegally. She is then an "applicant for admission" who is subject to mandatory detention by ICE
19 under 8 U.S.C. § 1225(b)(2)(A). *See, generally, Cortes Alonzo v. Noem et al.*, 1:25-cv-01519-WBS-
20 SCR at Dkt. 14 (E.D. Cal. Nov. 17, 2025); *Ramos v. Lyons et al.*, 2:25-cv-09785-SVW-AJR at Dkt. 8
21 (C.D. Cal. Nov. 12, 2025). She is also not entitled to a bond hearing for these same reasons. Therefore,
22 the Petitioner's motion for a temporary restraining order should be denied.

23 ///

24 ///

25 ///
26
27
28

1 The Respondents do not request a hearing on this matter.¹

2
3 Dated: December 23, 2025

ERIC GRANT
United States Attorney

4
5 By: /s/ Joseph Barton
JOSEPH D. BARTON
Assistant United States Attorney
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

25 ¹ The Respondents reviewed the cases cited in the Court's minute order dated December 19,
26 2025. *See* Dkt. 5. The Respondents do not believe that these cases are substantively distinguishable
27 from the instant case. The Respondents, however, respectfully disagree with the Court's statutory
28 interpretation in those cases and believe that the statutory interpretation set forth above is the
correct interpretation.