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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Zoila Jut Sarax De Vasquez

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-01999-JDP

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, Zoila Jut Sarax De Vasquez, ("Ms. Jut Sarax De Vasquez"), respectfully submits this Reply to Respondent's Response to the Court's December 24, 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.

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

Petitioner respectfully requests immediate release as the Respondent has shown no legal authority to continue to hold petitioner pending the prolonged Ninth Circuit Appeals identified in Respondent's opposition causing continued irreparable harm.

Petitioners do not oppose treating the motion for a temporary restraining order as a motion for preliminary injunction. The Petitioner also does not request a hearing.

Date: December 30, 2025

Respectfully Submitted,

/s/ Robert Beles

Robert Beles

Attorney For Petitioner

Zoila Jut Sarax De Vasquez

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 30, 2025, in Oakland, CA.

/s/ Robert Beles

Robert Beles

Attorney For Petitioner

Zoila Jut Sarax De Vasquez