

United States District Court
Western District of Texas
El Paso Division

Maria Isabel Perez Caal,
Petitioner,

v.

No. 3:25-CV-00153-LS

Mary Anda-Ybarra, in her official capacity as Field Office Director, El Paso Field Office, U.S. Immigration and Customs Enforcement; Martin Sarellano Jr., in his official capacity as Assistant Field Office Director, El Paso Field Office, U.S. Immigration and Customs Enforcement; U.S. Immigration and Customs Enforcement Agency; Todd M. Lyons, in his Official capacity as Acting Director, U.S. Immigration and Customs Enforcement; Thomas Homan, in his official capacity as White House Border Czar; and Kristi Noem, In her official capacity as Secretary, U.S. Department of Homeland Security,
Respondents.

Respondents' Supplemental Brief

In response to this Court's order dated June 20, 2025 (ECF No. 14), Respondents report that Ms. Perez Caal remains detained in ICE custody in El Paso, Texas, with a final order of removal under 8 U.S.C. § 1231(a)(1)(A). Her detention is mandated by statute during the 90-day removal period. *Id.*; *see also* ECF No. 9 at 1–2.

Ms. Perez Caal's order of removal became final on April 18, 2025, which means the earliest possible date this removal period would end is July 17, 2025. *See id.* At or around that 90-day mark, if Ms. Perez Caal has not yet been physically removed from the United States, she will be provided a post-order custody review, consistent with the relevant regulations. *See generally* 8 C.F.R. § 241.4. This review will notify her of ICE's intent to either continue her detention under

section 1231 or release her from custody under an Order of Supervision. *Id.* Because Ms. Perez Caal's detention is not only lawful, but also *mandatory*, this habeas petition should be dismissed.

Respectfully submitted,

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