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10 **UNITED STATES DISTRICT COURT**
11 **FOR THE DISTRICT OF NEVADA**

12 HUGO GIL CANDIDO-BOLANOS,

13 Petitioner,

14 v.

15 JOHN MATTOS, TODD M. LYONS and
16 KRISTI NOEM,

17 Respondents.

Case No. 2:25-cv-1359-RFB-EJY

**Petitioner's Reply to Federal Defenders'
Limited Response to Petitioner's Motion
for Adjudication of Unresolved
Constitutional Claims, ECF No. 42**

18 Petitioner, through undersigned counsel, respectfully submits this Reply regarding the
19 Federal Respondents' Limited Response to Petitioner's Motion for Adjudication of Unresolved
20 Constitutional Claim, ECF No. 42 ("Response for Adjudication").

21 The Petitioner agrees with the Government that the pending Motion to Amend his Habeas
22 Petition (ECF No. 41) may more appropriately frame or consolidate the issues for the Court's
23 consideration once it is resolved.

24 Since filing the Motion for Adjudication (ECF No. 38), on October 8, 2025, the Court
25 granted Petitioner's motion for preliminary injunction (ECF No. 25) and enjoined Federal
Respondents from removing Petitioner from the U.S. District of Nevada until EOIR renders a
decision on his motion to reopen his removal proceedings. ECF No. 39. The immigration court

1 denied the motion to reopen on October 3, 2025. ECF No. 40. Petitioner appealed the denial to the
2 Board of Immigration Appeals (BIA) which is pending adjudication. *Id.* The BIA is a subagency
3 of the EOIR¹ and as such, the EOIR has not made a final decision on Petitioner's motion to
4 reopen his removal proceedings until the BIA renders their decision.

5 In view of the Government's decision not to submit a substantive response at this time,
6 Petitioner also respectfully reserves its right to address the merits should the Court determine
7 further briefing is required or appropriate following resolution of the motion to amend or related
8 administrative actions.

9 Respectfully submitted this 29th day of October 2025.

10 QUIROGA LAW OFFICE P.L.L.C.

11 /s/ Maria E. Quiroga

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¹ <https://www.justice.gov/eoir/eoir-organization-chart/map>