UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-23845-CIV-MARTINEZ

CHRISTIAN AGUILAR MERINO,

Petitioner,

v.

GARRETT RIPA, KRISTI NOEM, and
PAM BONDI, in their official capacities,

Respondents.

_____/

RESPONDENTS' RETURN
OPPOSING PETITION FOR WRIT OF HABEAS CORPUS

Petitioner Christian Aguilar Moreno is a 24-year-old Honduran national who entered the United States illegally in 2016. Under governing immigration laws, Petitioner has never been admitted or paroled into the United States and is subject to removal. Moreover, as an applicant for admission, those same laws mandate Petitioner's detention during his removal proceedings. As Respondents explain below, neither Petitioner's physical presence in the United States nor his discretionary special immigrant designation alter these circumstances. The Court should deny the Petition because it fails jurisdictionally and on the merits.

Despite its creative pleading—at its core—the Petition challenges the Department of Homeland Security's (DHS) decision to commence removal proceedings and DHS's actions arising from that decision. The challenged "arising from" actions and decisions include: which inadmissibility and removal charge DHS decided to bring against Petitioner; when DHS decided to start the removal proceedings; and which provision DHS decided to use to stay a statutorily prohibited bond entered by an immigration judge who lacked jurisdiction. The Immigration and Naturalization Act (INA) strips the Court of subject matter jurisdiction to review these executive

branch (DHS) decisions that all arise from the decision to commence removal proceedings against Petitioner. 8 U.S.C. §1252(g).

In addition, the Petitioner's detention during removal proceedings is constitutional and statutorily proper. The Petition fails on the merits for these reasons: *First*, the removal statutes that apply to Petitioner and under which he is charged as an inadmissible alien mandate his detention during removal proceedings. *Second,* the discretionary special immigrant juvenile designation that Petitioner obtained when he was 17 or 18 years old is not an admission into the United States. It does not grant him legal status in this country or entitle him to deferred removal from the United States. *Third*, DHS properly invoked a constitutionally sound automatic stay pending appeal of an immigration judge's bond decision that directly contravenes the INA. On all grounds, Petitioner's detention is proper.

I. Factual and Legal Background.

A. The Petitioner

The Petitioner, Cristian Aguilar Merino ("Petitioner"), is a native and citizen of Honduras. See Exhibit A, I-213. On October 22, 2016—when he was 15 years old— Aguilar illegally entered the United States without being admitted or paroled. *See id.* CBP detained Aguilar and, because he was an unaccompanied minor, transferred him to the custody of Office of Refugee Resettlement ("ORR"), which subsequently released him to the custody of his mother. See Exhibit B, ORR Release.

On October 23, 2016, CBP filed a Notice to Appear alleging that Aguilar was removable based on his illegal entry into the United States without being admitted or paroled. See Exhibit to Petition, 2016 NTA. On July 17, 2019, Aguilar, filed an I-360, Petition for Special Immigrant

(SIJ petition) form with USCIS. The SIJ petition was approved on December 3, 2019. See Exhibit C, Declaration. Petition Exhibit 4 (DE No. 1-5).

As explained in the approval notice, the Special Immigrant Juvenile designation "does not in itself grant any immigration status and does not guarantee that the alien beneficiary will subsequently be found to be eligible for a visa, for admission to the United States, or for an extension, change, or adjustment of status." Petition Exhibit 4 (DE No. 1-5).

Rather, the SIJS designation provides a future vehicle through which the alien may apply for status in the United States. It does not in and of itself confer any status. In connection with his SIJS, Petitioner received deferred action of his removal proceedings. Deferred action is an act of administrative convenience to the government which gives some individuals lower priority for removal from the United States for a specific time. Petitioner's grant of deferred action would remain in effect for a period of four years from the date of the notice, unless terminated earlier by USCIS. *See* Petitioner's Exhibit 4 (D.E. 1-5).

On September 13, 2021, DHS and Aguilar jointly moved to dismiss removal proceedings. On May 11, 2022, USCIS granted Aguilar Deferred Action Status based on the grant of the SIJ petition. See Exhibit C, Declaration and Pet'r Pet. at exh 4.

On May 12, 2022, Aguilar was arrested by state law enforcement for molestation of a child less than 12 years old, in violation of Fla. Stat. § 800.04(5)(B). The criminal case was dismissed in July 2022. See Exhibit D, Criminal record. On May 3, 2024, Aguilar applied for adjustment of status with USCIS, which remains pending. See Exhibit C, Declaration.

On June 6, 2025, ICE encountered Petitioner during a traffic stop and transferred him into ICE custody at the Krome Detention Center. On June 6, 2025, ICE initiated removal proceedings by issuing an NTA, charging him with removability as an inadmissible alien, pursuant to INA

section 212(a)(6)(A)(i), which is found at 8 U.S.C. §1182(a)(6)(A)(i). See Petitioner's Exhibit, NTA June 6, 2025. On August 1, 2025, an Immigration Judge granted Petitioner's request for a custody redetermination and granted a bond in the amount of $8,000. See Exh E, IJ Bond Decision.

On August 1, 2025, ICE filed Form EOIR-43, Notice of ICE Intent to Appeal Custody Determination with the Board of Immigration Appeals (Board), which was served on the Petitioner on the same date. The Notice invoked the automatic stay of the custody redetermination order pending DHS filing of the Notice to Appeal to the Board. See Exhibit C, Declaration; 8 C.F.R. § 1003.19(i)(2). On August 6, 2025, ICE filed a Notice of Appeal to the Board. *See id.* On August 8, 2025, Petitioner was released from custody because the Immigration Judge terminated removal proceedings without prejudice on August 6, 2025. See Exhibit C, Declaration; See Exhibit E, IJ Decision.

On August 11, 2025, Petitioner was again encountered and detained by ICE, and an NTA was filed with EOIR charging Petitioner with removability as an inadmissible alien, pursuant to INA section 212(a)(6)(A)(i), which is found at 8 U.S.C. §1182(a)(6)(A)(i) ("An alien present in the United States without being admitted or paroled, or who arrives in the United States at any time or place other than as designated by the Attorney General, is inadmissible). See Exhibit F, Aug 2025 NTA. On August 19, 2025, the Board issued a briefing schedule on the appeal in the custody proceedings. DHS timely filed its appeal brief on September 5, 2025. See Exhibit C, Declaration. The Petitioner remains detained at the Glades County Detention Center. Petitioner's next hearing before the Immigration Judge is September 10, 2025. *See id.*

II. Argument.

A. Lack of Subject Matter Jurisdiction.

The Court should deny the petition for lack of subject matter jurisdiction. Federal courts have limited jurisdiction; they possess "only that power authorized by Constitution and statute." *Kokkonen v. Guardian Life Ins. Co. of Am.*, 511 U.S. 375, 377 (1994). The party bringing the claim must establish that the court has subject matter jurisdiction. *See Sweet Pea Marine, Ltd. v. APJ Marine, Inc.*, 411 F.3d 1242, 1247 (11th Cir. 2005). Without subject matter jurisdiction, the court has no power to move forward with the case. *See Univ. of S. Ala. v. Am. Tobacco Co.*, 168 F.3d 405, 410 (11th Cir. 1999); *see also Belleri v. United States*, 712 F.3d 543, 547 (11th Cir. 2013) (explaining that, in federal court, jurisdiction takes precedence over the case merits).

Here, 8 U.S.C. §1252(g) precludes the Court's exercise of subject matter jurisdiction. That statutory section says that "no court shall have jurisdiction to hear any cause or claim by or on behalf of any alien arising from the decision or action by [DHS] to commence proceedings, adjudicate cases, or execute removal orders." It is a "discretion-protecting provision" that Congress designed to prevent the "deconstruction, fragmentation, and hence prolongation of removal proceedings." *Reno v. Am.-Arab Anti-Discrimination Comm.*, 525 U.S. 471, 487 (1999).

In our case, DHS commenced removal proceedings against Petitioner and properly charged him on the following ground of inadmissibility: as an alien who entered the United States without inspection or admission, pursuant to INA Section 212(a)(6)(A)(i), which is at 8 U.S.C. § 1182(a)(6)(A)(i). DHS also properly detained Petitioner on those charges pursuant to its authority under 8 U.S.C. §1225, allowing it to detain aliens who are present in the country unlawfully. That statute authorizes the detention of any alien who 1) is "an applicant for admission" to the United States and 2) is "not clearly and beyond doubt entitled to be admitted."

Id. § 1225(b)(2). Aliens, like Petitioner in our case, who are present in the United States without admission are "applicants for admission" as defined under section 235(b)(2)(A) of the INA, 8 U.S.C. § 1225(b)(2)(A), and must be detained for the duration of their removal proceedings. *See Jennings v. Rodriguez*, 583 U.S. 281, 300 (2018) (holding that the INA "unequivocally mandates" that aliens falling within the scope [of section 235(b)(1) and (2)] shall be detained).

Decisions on what removability charges fit an alien's circumstances and when to bring those charges are within DHS's discretion. They are not subject to review in district court. *See Alvarez v. U.S. Immigr. & Customs Enf't,* 818 F.3d 1194, 1203 (11th Cir. 2016) (precluding review of methods used by immigration authorities to secure an alien while awaiting an initial removal hearing because the decision to commence proceedings was the foundation of the claim). Instead, these decisions are subject to review in the normal course of removal proceedings, through appeals to the Board of Immigration Appeals (BIA) and federal Circuit Courts of Appeal.

In short, the Court here does not have jurisdiction to review whether Petitioner is an "applicant for admission" or to determine whether he is eligible for bond under the INA. Those are issues that are currently being litigated on appeal before the BIA that can later be litigated on appeal before the Eleventh Circuit Court of Appeals. Indeed, the BIA has issued a briefing schedule, and DHS filed its appellate brief on Friday. *See, e.g. Taal v. Trump*, No. 3:25-CV-335 (ECC/ML), 2025 WL 926207, at *2-3 (N.D.N.Y. Mar. 27, 2025) (finding that §1252(g) bars claims seeking to enjoin executive orders that would have placed petitioner in removal proceedings; petitioner would have opportunity to raise his constitutional challenges before immigration courts and the appropriate court of appeals).

Similarly, the decision on when to commence removal proceedings against Petitioner is within DHS's discretion. Petitioner's special immigrant juvenile designation is not an admission into the United States, nor does it *entitle* him to a deferral of removal proceedings. In 2022, the agency (while operating under a different executive branch administration, for the agency's administrative convenience, and before Petitioner was arrested on a state charge (that was later *nolle prossed)*), moved Petitioner's removal from the country to a lower spot on its "removal priority" list by granting Petitioner discretionary deferred action. Petitioner points to no statute or other legal authority that *entitles* him to deferred action of his removal proceedings for any required length of time. DHS's decision on when to commence removal proceedings against Petitioner (which it did in 2025) was within its discretion. The Court lacks jurisdiction to review that decision.

Similarly, the Court lacks jurisdiction to review DHS's decision to invoke the automatic stay of bond pending appeal provision of 8 C.F.R. §1003.19(i)(2), instead of utilizing the provision through which DHS requests a discretionary stay from the BIA pursuant to 8 C.F.R. §1003.19(i)(1). Again, Petitioner asks the court to run head-first into §1252(g)'s jurisdictional bar. DHS's decision to use the automatic stay option (particularly in a case where the applicable statute mandates Petitioner's detention throughout his removal proceedings) is within DHS's discretion and *arises from* the commencement of removal proceedings. Petitioner points to no binding case law in this Circuit that finds the automatic stay provision of 8 C.F.R. §1003.19(i)(2) constitutionally infirm. The court should decline Petitioner's invitation to do so here.

In sum, the Court should deny the Petition because the DHS actions that Petitioner challenges here arise from the decision to commence removal proceedings against him. The

subject matter jurisdiction stripping provision of U.S.C. §1252(g) bars the Court from exercising jurisdiction over Petitioner's claims.

B. Petitioner's Detention is Proper under Immigration Statutes and the Constitution.

In addition to failing jurisdictionally, the following creatively-articulated, yet factually and legally weak claims of Petitioner, also fail on the merits: that there is no statutory authority for Petitioner's detention; that a past administrative immigration arrest warrant trumps a valid and current Notice to Appear (NTA) charging document (which would conveniently result in the more lenient 8 U.S.C. §1226 detention statute (and not the strict mandatory detention provisions of 8 U.S.C. §1225) governing his detention; that his special immigrant juvenile designation bars his removal proceedings (and associated detention); and that DHS's use of the automatic stay provision when appealing his immigration bond is unconstitutional as applied to him and otherwise *ultra vires*. These arguments fail on the facts and law.

1. Petitioner's Mandatory Detention is Legal.

Petitioner is in the United States illegally. He is an alien who entered the United States without inspection or admission. Therefore, he is an "applicant for admission" under section 235(b)(2)(A) of the INA, 8 U.S.C. § 1225(b)(2)(A), subject to mandatory detention, and ineligible for a bond hearing. The statutory language is clear and applies to Petitioner. *See Chapman v. Hous. Welfare Rts. Org.*, 441 U.S. 600, 608 (1979) (noting that the Supreme Court's "task is to interpret the words of these statutes in light of the purposes Congress sought to serve."); *see also Kaiser Aluminum & Chem. Corp. v. Bonjorno*, 494 U.S. 827, 835 (1990) ("The starting point for interpretation of a statute 'is the language of the statute itself. Absent a clearly expressed legislative intention to the contrary, that language must ordinarily be regarded as

conclusive.'" (*quoting Consumer Prod. Safety Comm'n v. GTE Sylvania, Inc.*, 447 U.S. 102, 108 (1980))).

That Petitioner received an immigration arrest warrant in connection with a removal proceeding does not change that he is illegally present in this country, that he is an applicant for admission under 8 U.S.C.§ 1225, and that he is subject to mandatory detention during his removal proceedings. An arrest warrant does not trump a charging document, nor is it a golden ticket to bond. *See Matter of Yajure Hurtado,* 29 I&N Dec. 216 (BIA 2025).

The INA's text is not "doubtful and ambiguous" but is instead clear and explicit in requiring mandatory detention of all aliens who are applicants for admission, regardless of how long they have been in the country illegally; regardless of whether they were served with an arrest warrant; and regardless of whether they – like Petitioner – have a special immigrant designation. See INA § 235(b)(1), (2), 8 U.S.C. § 1225(b)(1), (2). *See Niz-Chavez v. Garland*, 593 U.S. 155, 171 (2021) (stating that "no amount of policy-talk can overcome a plain statutory command").

A case that the BIA decided just days ago (on September 5, 2025) brings home the point: Under the plain language of 8 U.S.C. § 1225(b)(2)(A), immigration judges lack authority to hear bond requests or to grant bond to aliens who, like Petitioner, are present in the United States without admission. The alien in *Matter of Yajure Hurtado,* 29 I&N Dec. 216 (BIA 2025), crossed the border into the United States without inspection in November 2022, near El Paso, Texas. In 2024, United States Citizenship and Immigration Services (USCIS) granted the alien (Yajure Hurtado) temporary protected status (TPS). That TPS expired on August 2, 2025, and on August 8, 2025, immigration official apprehended him. DHS issued Hurtado a notice to appear (NTA), charging him as inadmissible under section 212(a)(6)(A)(i) of the INA, 8 U.S.C. §

1182(a)(6)(A)(i), for being "[a]n alien present in the United States without being admitted or paroled, or who arrives in the United States at any time or place other than as designated by the Attorney General."

Hurtado requested a bond hearing before the immigration judge, who determined that he had no jurisdiction to set bond under the facts of the case. Hurtado appealed this determination (plus an alternative basis for bond denial) to the BIA. The question before the BIA was one of statutory construction: "Does the INA require that all applicants for admission, even those like [Hurtado] who have entered without admission or inspection and have been residing in the United States for years without lawful status, be subject to mandatory detention for the duration of their immigration proceedings, and thus the Immigration Judge lacks authority over a bond request filed by an alien in this category?" In answering **yes** to that question, the BIA focused on a plain language, in-depth analysis of 8 U.S.C. §1255, the statute that: governs the inspection, detention, and removal of aliens who have not been admitted to the United States; delineates categories of aliens that are "applicants for admission;" and sets out the mandatory detention requirements. *See Matter of Yajure Hurtado,* 29 I&N Dec. 216 (BIA 2025). *See also Jimenez v. Quarterman*, 555 U.S. 113, 118 (2009) ("As with any question of statutory interpretation, [the] analysis begins with the plain language of the statute."); *Robinson v. Shell Oil Co.,* 519 U.S. 337, 341 (1997) (. "The plainness or ambiguity of statutory language is determined by reference to the language itself, the specific context in which that language is used, and the broader context of the statute as a whole.").

In *Hurtado,* the BIA also considered the interplay between 8 U.S.C. §1225 (which requires mandatory detentions for applicants for admission and 8 U.S.C. §1226 (which generally governs the process of arresting and detaining aliens who are *deportable* under 8 U.S.C.

§1227(a) and allows, with certain restrictions, some bond jurisdiction). Rejecting the same argument that Petitioner appears to make in our case, the BIA panel in Hurtado ruled that §1226 does not purport to overrule the mandatory detention requirements for arriving aliens and applicants for admission explicitly set forth in 8 U.S.C. § 1225(b)(1), (2), and that it §1226 did not apply to alien Hurtado who was an applicant for admission subject to mandatory detention under the plain language of the INA – just like Petitioner in our case.

In addition, the BIA rejected Hurtado's argument that because he had been living in the interior of the United States for almost three years (since his November 2022 entry without inspection), he could not be considered as "seeking admission" as the phrase is used in section 235(b)(2)(A) of the INA, 8 U.S.C. § 1225(b)(2)(A). The BIA found that there was no legal authority for the proposition that after some undefined time residing in the interior of the United States without lawful status, an "applicant for admission" is no longer "seeking admission," somehow converting the alien's status into one that allows for bond under section 236(a) of the INA, 8 U.S.C.A. § 1226(a). *See also Matter of Lemus,* 25 I&N Dec. 734, 743 & n.6 (BIA 2012) (noting that "many people who are not actually requesting permission to enter the United States in the ordinary sense [including aliens present in the United States who have not been admitted] are nevertheless deemed to be 'seeking admission' under the immigration laws").

Moreover, as the *Hurtado* case recognizes, an immigration arrest warrant does not trump the charges in a notice to appear. Accordingly, the mere existence of an arrest warrant does not endow an immigration judge with authority to set bond for an alien who falls under section 235(b)(2)(A) of the INA, 8 U.S.C. § 1225(b)(2)(A). And, contrary to Petitioner's allegation in his filing, he is charged as an applicant for admission on a ground of inadmissibility (being in the country without inspection or parole under 8 U.S.C. 1182), not on a ground of deportability

pursuant to 8 U.S.C. 1227(c), which allows for removal of aliens (typically ones previously *admitted* to the United States) based on criminal conduct. Again, DHS charges Petition on a ground of inadmissibility, not of deportability. *See Zecena Osorio v. U.S. Attorney General*, 650 Fed. Appx. 971 (11th Cir. 2016) (holding that alien was inadmissible, rather than deportable, under the Immigration and Nationality Act; recognizing grounds of inadmissibility under 8 U.S.C. § 1182, as different from grounds of deportability under 8 U.S.C. § 1227).

And, Petitioner's special immigrant juvenile status did not, and does not, constitute admission into the United States for purposes of removability and detention decision. Indeed, the special immigrant juvenile status merely provides a future pathway to apply for lawful permanent resident status. As Petitioner's notice approving his special immigrant juvenile status says, the designation "does not in itself grant any immigration status and does not guarantee that the alien beneficiary will subsequently be found to be eligible for a visa, for admission to the United States, or for an extension, change, or adjustment of status." In addition, any deferred action on removal that Plaintiff received was an act of administrative convenience to the government which gives some individuals lower priority for removal from the United States. Special immigrant juvenile designation does not come with any statutory (or other) entitlement to deferral of removal proceedings

Petitioner's argument on his special immigrant juvenile status is analogous to the one rejected in *Pena v. Hyde*, 2025 WL 2108913, Case No. 25-11983 (D. Mass. July 28, 2025). In *Pena,* DHS charged the alien with being present in the country without admission, thus making him an "applicant for admission" subject to removal proceedings. Pena argued that he was entitled to remain in the country because the I-130 petition (permitting an individual who is a United States citizen to apply for a relative who is a noncitizen, including a lawful spouse, to

remain in the county) had been approved. With approval of an I-130, an alien may apply to adjust his immigration status to "lawful permanent resident." See 8 U.S.C. § 1255(a).

Like the special immigrant juvenile designation in our case, the approved I-130 petition in *Pena* was not a grant of admissibility or legal status in the United States. *Id. See also Saldivar v. Sessions,* 877 F.3d 812, 818 n.7 (9th Cir. 2017) ("[A]n alien who was never otherwise admitted could not be considered admitted in any status when his I-130 visa petition was approved."); *Firstland Int'l, Inc. v. INS,* 377 F.3d 127, 132 n.6 (2d Cir. 2004) ("[The] approval of a ... visa petition does not, by itself, entitle an alien to permanent resident status ...."). In *Pena*, the court found that the alien remained an applicant for admission, notwithstanding the approval of his I-130 petition. And because the alien there remained an applicant for admission, detention was mandated pursuant to 8 U.S.C. § 1225(b)(2)(A).

2. DHS's Use of Automatic Stay of Bond Provision Pending BIA Appeal is Constitutional.

When the immigration judge in Petitioner's case went beyond her jurisdiction by granting bond to Petitioner (an "applicant for admission" who *must be detained* during his removal proceedings pursuant to the clear language of 8 U.S.C. §1252), DHS immediately appealed the decision to the BIA, pursuant to 8 C.F.R. §1003.19(i)(2), which automatically stayed the bond. The regulations provide that the automatic stay lapses 90 days after the filing of the notice of appeal. After that time, additional stay extensions may be implemented based on input from DHS and the BIA. 8 C.F.R.§1003.6. When automatic stays are invoked, the BIA tracks the progress of the appeal to avoid unnecessary delays in completing the record for decision. 8 C.F.R.§1003.6.

Here, once DHS appealed the bond and invoked the automatic stay on, the BIA promptly entered a briefing schedule. Indeed, DHS has already filed its appeal brief. The issue is squarely before the BIA, in line with the specific appellate review process that the INA sets out. The

Court should decline Petitioner's invitation to involve itself in this review and process. Neither the constitution nor statutory law call for it.

The recent cases that Petitioner cites on the constitutionality of the automatic stay are not from this Circuit (or district). They do not bind the Court. Moreover, they were decided in response to what apparently been perceived as an "increased use" by the Trump administration. However, that an administration chooses to prioritize immigration enforcement is not unconstitutional. That it chooses to utilize the lawfully enacted automatic stay provision on bond appeal likewise does not run afoul of the constitution. Nor is it ultra vires. This is particularly true where, as here, DHS invoked the automatic stay when appealing a bond that contravened the governing mandatory detention statute.

In addition, use of the automatic stay provision does not violate Petitioner's substantive or procedural due process rights. The statute that governs Petitioner's detention (8 U.S.C. §1225) mandates detention during the pendency of his removal proceedings. Therefore, a "stay" of the immigration judge's erroneous bond determination should have no effect on his detention, since it is likely that the BIA will reverse the grant of bond based on its recent decision in *Matter of Hurtado* and other legal authority. *See Pisciotta v. Ashcroft*, 311 F.Supp.2d 445 (D.N.J. 2004) (where alien was mandatorily detained during removal proceedings, use of automatic stay provision (8 C.F.R. § 1003.19(i)(2)) was constitutional).

Plus, Petitioner has been detained for about three months – not an unreasonable amount of time. And there is a termination point to this detention: the end of his removal proceedings. There is no constitutional violation. *See Demore v. Kim*, 538 U.S. 510, 511 (2003) *(*detention is a constitutionally permissible part of the removal process); *Reno v. Flores*, 507 U.S. 292, 306 (1993) (affirming detention of juvenile noncitizens on suspicion of being deportable); *cf.*

Zadvydas v. Davis, 533 U.S. 678, 701 (2001) (permitting release only after the alien bears the initial burden to show "that there is no significant likelihood of [his] removal in the reasonably foreseeable future").

In the immigration context, the government's plenary authority is at its zenith, *see Flores*, 507 U.S. at 305, and immigration detention pending completion of removal proceedings has a definite termination point. *Jennings v. Rodriguez*, 583 U.S. 281, 304 (2018). Use of the automatic stay provision is constitutional, particularly since Petitioner's detention during removal proceedings is mandatory.

In short, DHS's use of a lawfully enacted regulation (8 C.F.R. § 1003.19(i)(2)) that authorizes DHS to invoke an automatic stay of bond determinations is constitutional, both facially and as applied. It does not violate substance or procedural due process; nor is it ultra vires.

III. Conclusion.

For these reasons, the Court should deny the Petition.

Date: September 9, 2025.

Respectfully submitted,

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