

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Pedro Rodrigo Rodas Rodas,

Petitioner,

v.

Pamela Bondi, Attorney General,

Kristi Noem, Secretary, U.S. Department of
Homeland Security,

Department of Homeland Security,

Todd M. Lyons, Acting Director of
Immigration and Customs Enforcement,

Immigration and Customs Enforcement,

Sirce Owen, Acting Director for Executive
Office for Immigration Review,

Executive Office for Immigration Review,

Samuel Olson, Director, St. Paul Field Office,
Immigration and Customs Enforcement,

and,

Ryan Shea, Sheriff of Freeborn County.

Respondents.

0:25-cv-03432-JRT-LIB

**SECOND DECLARATION
OF GABRIELA
ANDERSON IN SUPPORT
OF PEDRO RODRIGO
RODAS RODAS'S
PETITION FOR WRIT OF
HABEAS CORPUS**

I, Gabriela Anderson, being first duly sworn upon oath, depose and state as follows:

1. I am an attorney licensed in Minnesota. My attorney's license number is 0504395. My place of business is Wilson Law Group, 3019 Minnehaha Avenue, Minneapolis, MN 55406. My direct phone number is 612-436-8185.
2. I am admitted to practice before the U.S. District Court of Minnesota. My admission is in good standing.
3. I am not subject to any pending disciplinary proceeding or any restriction on my capacity to practice law.
4. I attach as Exhibit Q, a true and correct copy of Department of Justice, Executive Office for Immigration Review, Board of Immigration Appeals, Decision and Order dated October 14, 2025, respectively, sustaining the Department of Homeland Security's appeal and vacating the Immigration Judge's grant of bond.
5. It is no longer necessary for the Court to address the automatic stay portion of Petitioner's claim because the Board of Immigration Appeals has now reversed and vacated the grant of bond.
6. The Court need only focus on the issue of whether 8 U.S.C. § 1225 or § 1226 governs Petitioner's detention.
7. Petitioner asserts that the Board of Immigration Appeal's position is contrary to law for the reasons stated in Petitioner's previous legal argument submissions.

I hereby declare under penalty of perjury that everything in this declaration is true and correct.

Dated: October 14, 2025

/s/ Gabriela Anderson
Gabriela Anderson, Esq.
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