

Respond to DHS's Claim
Request to Expedite the ruling

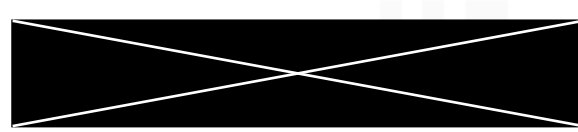
U.S. DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA	FILED
	OCT 28 2025
CLERK, U.S. DISTRICT COURT	KCR

your Honor,

Heretby, I present my arguments. additionally my request is "expediting the ruling" and "granting release".

Notably, there is no equipement in the facility to Send a Copy of this respond to AUSA. May I be excused to Ask the Court to share a Copy.

1. In page one of ICE response, the Gov wrote "petitioner's claim is properly raised under Zadnydas v Davis 533 US 678 (2001)"
In fact, ICE Can't detain or Continue to imprisonment of The petitioner indefinitely and endlessly, when they failed to effectuating removal.
2. ICE Can't prolong my aimless Punitive detention more than 180 days.
3. Regarding the FACTS and 33 months in Carceration. The petitioner Confessed in the writ of Habeas Corpus admittedly and verily. I paid the price and feel Sorry.
4. This aimless punitive imprisonment is against Zadnydas The invalid Speculating answer and foundationless Presume of ICE isn't a Concrete facts. Period.



5. The time necessary to execute the removal, has a limitation and boundary. It's not mean to hold the Petitioner in Custody indefinitely with an imagination of deportation to Cuba.
6. Continually and overwhelmingly, more than 6 times, the AUSA claimed "The alien must provide a good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future" Even though, a reasonable period of Post-order detention is legally clear, but the questions remain: Where is the travel documents? Where is a booked ticket? Where is a request to the Cub's Embassy? any Passport? Crystally clear, there is no ground for effectuating deportation in foreseeable future to CUBA.
7. I have a US Citizen family and ties to Community and ICE Can't devastate my family based on "if" or "but."
- Frankly and admittedly, ICE failed in obtaining a temporary TD or Pass from Cuba. There is no diplomatic ties.
- Simply put, the lack of visible progress, in removal process is undeniable and unchallengeable.

8. incontrovertibly and unarguably, the Gov has no sufficient evidence to showing the Capability of executing removal.

This Court Can't accept this Sentence in Page 4 of the ICE response. in actuality the claim of ICE is groundless and should be dismissed. there is no reason to believe "Soon" and repeatation of "diligently working to execute the removal".

In Page 5, they wrote "there is no response from Cuba" It means, the Gov is unable or incapable to prove that removal is likely in the reasonably foreseeable future.

in actuality, they have no documents or evidence to believe this claim.

Indeed, this is crystal clear that the ICE is unable to remove to Cuba.

I hope to be eligible for "expedite ruling" because of this prolonged detention. please grant the petitioner release. my case and factual reasons merit further consideration.

Respectfully Submitted

19 Oct 2025

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