

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

FILED

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KM

CLERK, U.S. DISTRICT COURT

Case: 3:25-CV-02575-D-BK

manuel, Tellez

A: 

Respond To the Claim of ICE

Your Honor,

Primarily, I should say that I'm not well-equipped to write the answer in type, or plain paper or send a copy to Gov. Hopefully, the clerk share a copy of this Respond to the Gov.

1. I admittedly informed the Court, that I'm in detention of ICE since May 27, 2025 undisputedly, it is above 150 days by now.
2. I Confessed verily about my Convicted Charges on Aug 21, 2007. No remonstrance.
3. genuinely, I have no doubt regarding the removal power of the US Gov, which could removed 1014 Cuban national to MemCo with Final order of Removal.
4. The Acting United States Attorney (AUSA) shows no-evidence regarding removal in reasonably foreseeable future.
5. Analytically, The Argument of AUSA is groundless legally re detaining Petitioner is an aimless punitive detention. after a period of 150 days, Surely ICE intend to extend "removal Period" beyond 180 days. They will Continue detention because

They Can't effectuate the removal from US, regardless of the burdens of proof. So, this "aimless punitive detention" cannot be lawful and legitimate.

6. When US released me after 192 months imprisonment, I tried to start a business productively. In fact, lamentably and sorrowfully, I tried to rebuilt my family, paid taxes and be a new person in the US Society, even though regretful and heart broken. DHS/ICE know well that I have no charges, stayed clean.
7. It will be appreciated the Court or DHS/ICE release me on OSUP once again and when practically and successfully they can effectuate the removal; certainly the petitioner will not have any challenge.
8. Well foundedly, I agree with AUSA that "the Gov cannot indefinitely detain an alien before removal". After 3 weeks, my challenge through this Petition of Habeas, will be started in practice to criticize the lack of reasonableness of my detention, which won't be presumptively reasonable.
9. Respectfully, the speculative and hypothetical answer of AUSA is groundless and insufficient to satisfy the Court. on Contrary, indeed, my removal is not reasonably foreseeable and there's no significant likelihood of my removal.
10. I hope the Court consider all aspects favorably and grants me relief.

Respectfully