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8 **UNITED STATES DISTRICT COURT FOR THE**  
9 **DISTRICT OF ARIZONA**

10 Oscar Armando Solis Quintanilla,

Case No.: 2:25-cv-03828

11  
12 Petitioner,

13 v.

14 Kristi Noem, *et al.*,

15  
16 Respondents.

**REPLY BRIEF IN  
SUPPORT OF MOTIONS  
FOR TEMPORARY  
RESTRAINING ORDER  
AND PRELIMINARY  
INJUNCTION**

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**TABLE OF CONTENTS**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

TABLE OF CONTENTS..... ii

Argument ..... 1

    I. This Court has jurisdiction to enjoin removal pending an IJ review of Petitioner’s denied fear interview..... 1

    II. Respondents’ procedures for third country removals fall short of providing due process under the Fifth Amendment. .... 8

Conclusion ..... 11

CERTIFICATE OF SERVICE ..... 12

1 In 2019, Petitioner Oscar Solis Quintanilla was granted withholding of removal to  
2 his native El Salvador because an Immigration Judge (“IJ”) found it was more likely than  
3 not that he would be tortured there. He had a full and fair opportunity to raise this claim  
4 before the Immigration Judge. More than six years later, Respondents have detained him  
5 and informed him that he will be removed—now, to Mexico. Petitioner fears removal to  
6 Mexico and has complied with all presently available procedures to state that claim.  
7 However, Respondents’ current practices arbitrarily bar Petitioner from receiving the full  
8 and fair opportunity to be heard that he enjoyed six years ago. Petitioner asks that this Court  
9 afford him an additional, modest procedural safeguard already provided to any other  
10 noncitizen who undergoes a threshold screening for fear-based relief: the opportunity to  
11 have the results of his fear interview reviewed by an Immigration Judge. This Court has the  
12 jurisdiction to grant the requested relief, and due process requires it.

### 16 Argument

#### 17 **I. This Court has jurisdiction to enjoin removal pending an IJ review of** 18 **Petitioner’s denied fear interview.**

19 Respondents’ jurisdictional arguments all suffer from one fatal flaw: the assumption  
20 that Petitioner is challenging his 2019 removal order, or the decision to execute it now. He  
21 is not. Petitioner instead challenges the procedures by which Respondents will determine  
22 whether that removal order may be executed to one particular country, Mexico, where he  
23 contends that his life and freedom would be at risk based on a protected ground. If Petitioner  
24 is correct, 8 U.S.C. § 1231(b)(3) bars Respondents from sending him to Mexico. But this  
25 does not affect the validity of his 2019 removal order: as the Supreme Court recently  
26 explained, “the finality of an order of removal does not depend in any way on the outcome  
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1 of the withholding-only proceedings.” *Riley v. Bondi*, 145 S. Ct. 2190, 2199 (2025). If  
2 Petitioner successfully makes a case for withholding of removal to Mexico, he still has a  
3 final order of removal—there is simply a second country to which it may not be executed.  
4

5 Section 1252(g): 8 U.S.C. § 1252(g) does not strip this court of jurisdiction to  
6 consider Petitioner’s due process claim.<sup>1</sup> The Supreme Court has cautioned against an  
7 overbroad application of § 1252(g)’s jurisdiction-stripping provision, holding that it  
8 “applies only to three discrete actions that the Attorney General may take: her decision or  
9 action to commence proceedings, adjudicate cases, or execute removal orders.” *Reno v.*  
10 *Am.-Arab Anti-Discrimination Comm.*, 525 U.S. 471, 482 (1999) (internal quotations  
11 omitted). The Ninth Circuit recently echoed this holding, reasoning that an overly broad  
12 reading of § 1252(g)’s jurisdiction-stripping provision would, impermissibly, “entirely  
13 insulate from judicial review any post-hearing decision by ICE to remove noncitizens to  
14 third countries where they would be in danger of persecution, torture, and even death.”  
15 *Ibarra-Perez v. United States*, 2025 WL 2461663 at \* 7 (9th Cir. 2025). Indeed, the Ninth  
16 Circuit clearly states that “§ 1252(g) does not prohibit challenges to unlawful practices  
17 merely because they are in some fashion connected to removal orders.” *Id.*; *see also Abrego*  
18 *Garcia v. Noem*, 2025 WL 1021113, at \*2 (4th Cir. Apr. 7, 2025) (Thacker, J. and King,  
19 J.), *aff’d*, 145 S. Ct. 1017 (2025) (Section 1252(g) “strips the federal courts of jurisdiction  
20 only to review the Attorney General’s exercise of **lawful** discretion to commence removal  
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26 <sup>1</sup> Contrary to Respondent’s straw-man argument, Petitioner does not claim that “due process  
27 considerations create an exception to section 1252(g).” Dkt. No. 12 at 6. Rather, he raises  
28 a due process claim to which § 1252(g) simply does not apply, as the claim arises from  
agency action collateral to his long-closed removal proceedings.

1 proceedings, adjudicate those cases, and execute orders of removal.” (Emphasis in  
2 original.))

3 Respondents rely on *Rauda v. Jennings*, 55 F.4th 773 (9th Cir. 2022), to support  
4 their argument that Section 1252(g) bars this Court’s review of Petitioner’s claim. *Rauda*  
5 is highly distinguishable from Petitioner’s case, as it concerned a noncitizen who sought to  
6 stay his removal to El Salvador (carried out pursuant to a final order of removal to that  
7 country) while he awaited a decision on a motion to reopen his immigration proceedings.  
8 55 F.4th at 776. The District Court found, and the Ninth Circuit affirmed, that Section  
9 1252(g) barred its review because the core of Rauda’s claim challenged the government’s  
10 decision to execute his removal order to the sole country where he had been ordered  
11 removed. The Ninth Circuit found that the decision *when and whether* to execute his final  
12 order of removal was the type of discretionary determination made unreviewable by Section  
13 1252(g). *Compare id.* at 778-79 with *Ibarra-Perez v. United States*, 2025 WL 2461663, at  
14 \* 7 (9th Cir. 2025) (“Because Mexico was not mentioned in the order of removal, Ibarra-  
15 Perez does not challenge the ‘execution’ of his removal order”).

16 Indeed, Respondents muster no response to *Ibarra-Perez*, which is completely on  
17 point. In *Ibarra-Perez*, the noncitizen challenged the insufficient procedural protections  
18 afforded him before the government removed him to Mexico, a third country to which he  
19 had not been ordered removed by an IJ. Here, as in *Ibarra-Perez*, Petitioner does not  
20 challenge the “execution” of his existing removal order, but rather the process he has been  
21 afforded post-removal order.<sup>2</sup> Petitioner’s claim is therefore highly distinct from those

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28 <sup>2</sup> The Southern District of Texas considered (and found jurisdiction to hear) the same

1 historically found unreviewable pursuant to § 1252(g), such as challenges to the execution  
2 of a longstanding removal order or to the government’s arrest and detention of a noncitizen.  
3  
4 *See Rauda*, 55 F.4th at 778-79; *Gupta v. McGahey*, 709 F.3d 1062 (11th Cir. 2013); *see*  
5 *also n.4, infra*. Particularly because the Ninth Circuit recently approved district court review  
6 of collateral claims analogous to Petitioner’s in *Ibarra-Perez* (and Respondents’ reply does  
7 not even attempt to distinguish that case), Respondents’ argument that § 1252(g) strips this  
8 Court’s jurisdiction over this matter falls short.  
9

10 The same is true of Respondents’ other circuit court cases. In *Camarena v. Dir., ICE*,  
11 988 F.3d 1268 (11th Cir. 2021), the Eleventh Circuit found it lacked jurisdiction to review  
12 a claim that fundamentally challenged the government’s decision to execute the petitioners’  
13 removal orders, despite petitioners’ attempt to frame their challenge as one to the Secretary  
14 of Homeland Security’s “authority” to remove them so as to fall outside the ambit of Section  
15 1252(g).<sup>3</sup> No case cited by Respondents considered a constitutional claim regarding the  
16 sufficiency of process afforded to a noncitizen facing removal to a previously undesignated  
17 third country and claiming a fear of such removal.  
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21 claim in *Sagastizado Sanchez v. Noem*, 2025 WL 2957002, at \*6 (S.D. Tex. Oct. 2, 2025).

22 <sup>3</sup> Respondents also cite *E.F.L. v. Prim*, 986 F.3d 959, 964-65 (7th Cir. 2021), which found  
23 no jurisdiction over a petition seeking to enjoin execution of a removal order while  
24 petitioner sought discretionary immigration relief outside of removal proceedings. In  
25 addition to the fact that Petitioner here does not challenge the execution of his removal  
26 order, it is worth noting that the additional procedural protections he seeks safeguard his  
27 means of seeking *mandatory* relief from removal to Mexico. Respondents also cite *Tazu v.*  
28 *Att’y Gen. United States*, 975 F.3d 292, 297 (3rd Cir. 2020); *Hamama v. Adducci*, 912 F.3d  
869, 874-77 (6th Cir. 2018); and *Silva v. United States*, 866 F.3d 938, 941 (8th Cir. 2017),  
all of which arrive at the same essential holding: that Section 1252(g) bars district court  
review of the DHS Secretary’s discretionary determinations as to when and whether to  
execute existing orders of removal.

1 Respondents also raise a faulty comparison to this Court's recent order denying a  
2 TRO in *Quach v. Noem*, Dkt. 26, No. 25-cv-02937-JJT (JFM) (D. Ariz. Oct. 17, 2025). The  
3 *pro se* petitioner in *Quach* sought a stay of removal pending the adjudication of a habeas  
4 petition in which he raised challenges to his underlying removal order (which, again,  
5 Petitioner here does *not* do). Judge Tuchi further found that the request for a stay of removal  
6 did not relate to Quach's underlying habeas claims. The opposite is true here, as Petitioner  
7 asks this Court to enjoin his removal to Mexico pending a decision on the constitutionality  
8 of the government's current procedures for determining whether he merits a mandatory  
9 grant of withholding of removal to that country. Petitioner properly raised this issue in his  
10 complaint. Dkt. No. 1 at ¶¶ 45-47.

13 Respondents' comparisons to other recent district court cases also miss the mark.  
14 *Turcio v. Noem*, 2025 WL 2124129 (S.D.N.Y. July 29, 2025) concerned a habeas petition  
15 seeking to stay the imminent execution of an order of removal so the petitioner could file a  
16 motion to reopen his proceedings, thus vacating his removal order entirely.<sup>4</sup> In clear  
17 contrast to these cases, Petitioner does not challenge his underlying removal order or its  
18 execution, nor does he seek a stay of removal so he can pursue a reopening of that order;  
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23 <sup>4</sup> *Hernandez-Morales v. Bondi*, 2025 WL 2932650 (S.D. Cal. Oct. 15, 2025) involved a  
24 similar set of facts: believing the execution of his longstanding order of removal was  
25 imminent, Hernandez-Morales sought a District Court stay while he awaited a decision on  
26 a motion to reopen. The District Court found that under these facts, *Rauda* controlled. In  
27 *Guerrero Sandoval ex rel. CDBG v. Bondi*, 2025 WL 1477059 (S.D. Ohio May 22, 2025),  
28 the court found that Section 1252(g) barred review of a decision to execute a removal order.  
The court further held that the constitutional claims that could have brought their petition  
outside Section 1252(g)'s ambit were foreclosed by binding precedent and therefore could  
not help the petitioners overcome Section 1252(g)'s jurisdictional bar to review.

1 rather, he seeks injunctive relief based on the due process claim properly raised in his  
2 petition for relief and not foreclosed by binding precedent.

3 Sections 1252(a)(5), (b)(9): Respondents also raise 8 U.S.C. §§ 1252(a)(5) and  
4 (b)(9), arguing that these sections require Petitioner’s claims to be made in a Petition for  
5 Review to the U.S. Court of Appeals. But this argument fails, since – again – Petitioner is  
6 not here seeking judicial review *of his 2019 removal order*. Instead, he is seeking judicial  
7 review of the procedures under which the government will determine whether it is  
8 permissible to remove him to a specific country that was never designated in his underlying  
9 proceedings.  
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12 As the Ninth Circuit recently held in *Ibarra-Perez v. United States*:

13 Because Ibarra-Perez challenges ICE’s actions taken after his removal  
14 proceedings before the IJ and BIA had ended, neither section  
15 applies. Section 1252(a)(5) does not apply because Ibarra-Perez does not seek  
16 review of his removal order. Similarly, § 1252(b)(9) does not apply because  
17 Ibarra-Perez brings claims that arose after completion of his removal  
18 proceedings. Instead, Ibarra-Perez challenges ICE’s separate and post-hearing  
19 decision to remove him to Mexico. He could not have contested this decision  
20 through the normal petition-for-review process because it was made after his  
21 removal proceedings had ended. The government attorney never mentioned  
22 Mexico as a possibility during Ibarra-Perez’s proceedings before the IJ, and  
23 the IJ did not designate Mexico as an alternative country of removal. To state  
24 the obvious, Ibarra-Perez could not seek review of a decision that had not been  
25 made.

26 2025 WL 2461663, at \*9, citing *Aden v. Nielsen*, 409 F. Supp. 3d 998, 1006 (W.D. Wash.  
27 2019) (holding that a habeas petitioner’s challenge to a country-of-removal designation was  
28 not barred by § 1252(a)(5) because ICE acted “outside of removal proceedings”).

Respondents cite several cases in support of their argument that these provisions of  
Section 1252 deprive this Court of jurisdiction, but their reliance is misplaced. The sole  
Ninth Circuit case Respondents cite in their argument regarding Sections 1252(a)(5) and

1 (b)(9) is, like *Rauda*, easily distinguishable from the case at hand. In *J.E.F.M. v. Lynch*, 837  
2 F.3d 1026, 1032 (9th Cir. 2016), the Court found that it did not have jurisdiction to review  
3 petitioners' claims to a right to counsel *in removal proceedings* outside of the statutorily  
4 prescribed circuit court Petition for Review process, since those claims necessarily *arise*  
5 *from* removal proceedings. *Id.* at 1033-1034. In contrast, Petitioner's claim arises solely  
6 after and apart from his 2019 removal proceedings, during which Respondents did not so  
7 much as mention the possibility of removing him to Mexico. *See id.* at 1032, citing *Singh*  
8 *v. Gonzales*, 499 F.3d 969, 979 (9th Cir. 2007). Unlike *J.E.F.M.*, Petitioner's claim does  
9 not concern the procedures leading to the entry of his removal order. Respondents'  
10 argument that Petitioner's claim should somehow be funneled into the PFR process is  
11 therefore without merit.

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15 The out-of-circuit cases Respondents cite also offer little support for their argument  
16 under Sections 1252(a)(5) and (b)(9). In *Aguilar v. ICE*, 510 F.3d 1 (1st Cir. 2007), the First  
17 Circuit agreed that claims "collateral to" removal proceedings may be reviewed by the  
18 federal courts. As a result, it found District Court jurisdiction over a claim deemed collateral  
19 while simultaneously determining that constitutional claims regarding the procedural  
20 protections provided to noncitizens *during removal proceedings* were unreviewable. *Id.* at  
21 19. *Aguilar* therefore comports with the *Ibarra-Perez* court's holding that a claim's having  
22 "some connection" to a noncitizen's removal from the U.S. does not suffice to trigger one  
23 of Section 1252's jurisdictional bars. *Id.* However, *Aguilar* does little to support  
24 Respondents' argument that Sections 1252(a)(5) and (b)(9) bar district court review here.<sup>5</sup>

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28 <sup>5</sup> Similarly, the discussion Respondents cite in *Rosario v. Holder*, 627 F.3d 58, 61 (2d Cir.

1 In contrast to the noncitizens in these cases, Petitioner does not request a stay pending a  
2 challenge to his underlying removal order, nor raise any legal claims arising from his long-  
3 closed removal proceedings. His claim solely concerns actions taken “outside of removal  
4 proceedings.” *Aden*, 409 F. Supp. 3d at 1006. Respondents’ jurisdictional arguments based  
5 on provisions of Section 1252 therefore fail.  
6

7 **II. Respondents’ procedures for third country removals fall short of providing**  
8 **due process under the Fifth Amendment.**

9 Respondents provide little substantive reply to Petitioner’s due process claim. *See*  
10 Dkt. No. 8 at 8-11. “‘It is well established that the Fifth Amendment entitles aliens to due  
11 process of law’ in the context of removal proceedings. . . So, [noncitizens facing removal]  
12 are entitled to notice and opportunity to be heard “‘appropriate to the nature of the case.’”  
13 *Trump v. J.G.G.*, 604 U.S. 670, 673 (2025) (per curiam), quoting *Reno v. Flores*, 507 U. S.  
14 292, 306 (1993).  
15

16 Respondents contend that simply providing notice of a country of removal and a  
17 screening interview with a USCIS asylum officer satisfies their duty to afford “appropriate”  
18 notice and opportunity to be heard. However, without the critical safeguard of IJ review,  
19 this procedure falls short of the Fifth Amendment’s demands. In *every other instance* in  
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24 2010) concerns the contours of the Circuit Courts’ permissible review of BIA decisions—  
25 an issue wholly outside the scope of the Petitioner’s claim, which seeks review of collateral,  
26 post-removal order agency procedures. Respondents’ citation to *Ajlani v. Chertoff*, 545 F.3d  
27 229, 235 (2d Cir. 2008) is also unhelpful, as the Second Circuit there found no jurisdiction  
28 to consider a noncitizen’s *pro se* petition raising constitutional claims against the  
government’s initiation of removal proceedings against him. Finally, Respondents’  
invocation of *Jennings v. Rodriguez*, 583 U.S. 281, 294-95 (2018) is again beside the point,  
as the Supreme Court found that Section 1252(b)(9) barred challenges to discretionary  
decisions to detain or seek the removal of noncitizens, and no such decision is at issue here.

1 which a USCIS screening interview is used to evaluate a noncitizen's fear-based claim, the  
2 statute or regulations afford the noncitizen the opportunity to seek IJ review thereof. *See* 8  
3 U.S.C. § 1225(b)(1)(B)(iii)(III); 8 C.F.R. § 1208.30(g); 8 C.F.R. § 1208.31(g).<sup>6</sup> Per the  
4 Respondents' interpretation, the INA and its implementing regulations afford more process  
5 to noncitizens who have just entered the United States, or who have unlawfully re-entered  
6 after prior removal, than to Petitioner, who has resided in the U.S. for a decade, lived and  
7 worked lawfully in the community pursuant to an Order of Supervision since 2020, and  
8 never been removed from the country. Dkt. No. 1 at ¶¶ 30-32.<sup>7</sup> Further, had Respondents  
9 designated Mexico as an alternative country of removal in Petitioner's underlying removal  
10 proceedings, he would have had the opportunity to seek withholding of removal before the  
11 IJ with no threshold screening required. *See* 8 C.F.R. § 208.16(a); (c)(4). Respondents have  
12 not explained why Petitioner may permissibly be afforded thinner protections now.  
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16 Respondents also state that Petitioner does not point to any statutory provisions or  
17 regulations that the government has violated. However, Petitioner argues that Respondents  
18 violate 8 U.S.C. § 1231(b)(3), which prohibits his removal to a country where the Attorney  
19 General determines that his life or freedom would be threatened on account of a protected  
20 ground. § 1231(b)(3) creates a right not to face removal to such a country, and the  
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23 <sup>6</sup> *See also Cruz-Medina v. Noem*, 2025 WL 2841488, at \*7 (D. Md. Oct. 7, 2025) (“DHS  
24 regulations address various scenarios where individuals may seek protection from removal  
25 based on a fear of how they will be treated in another country, and in every scenario  
26 addressed by those regulations they entitle noncitizens to *de novo* review by an immigration  
27 judge of negative asylum officer determinations”).

28 <sup>7</sup> *See also Sagastizado Sanchez*, 2025 WL 2957002, at \*11, citing *DHS v. Thuraissigiam*,  
591 U.S. 103 (2020) (questioning the lower procedural protections offered to withholding  
of removal grantees who have long resided in the U.S.).

1 Respondents' present procedures for third country removals are insufficient to satisfy the  
2 *Mathews* test with regard to that right.<sup>8</sup> As discussed in Petitioner's Memorandum in  
3 Support of his PI and TRO Motions (Dkt. No. 8 at 4-7), the *Mathews* balancing test tilts  
4 strongly in favor of affording IJ review of his negative fear interview before he is removed  
5 to Mexico. Respondents make no arguments whatsoever to the contrary, incorrectly stating  
6 only that *Mathews* bears on Petitioner's argument in a "generic" manner when it is in fact  
7 the appropriate test for a procedural due process claim like Petitioner's. *See, e.g., Pablo*  
8 *Sequen v. Albarran*, 2025 WL 2935630, at \*6 n.2 (N.D. Cal. Oct. 15, 2025) ("[B]oth the  
9 Ninth Circuit and other federal courts of appeal regularly apply *Mathews* to due-process  
10 claims involving removal proceedings"). Pursuant to this analysis, at least two District  
11 Courts have agreed that the *Mathews* test requires, at minimum, that noncitizens in  
12 Petitioner's position be afforded IJ review of their fear claims.<sup>9</sup>

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16       Though Respondents do not engage with Petitioner's due process arguments  
17 applying *Mathews*, they claim that Petitioner seeks more process than he is due based on  
18 the decision in *D.V.D. v. U.S. Dep't of Homeland Security*, 778 F. Supp. 3d 355, 364 (D.  
19 Mass. 2025). In that case, the District Court entered an injunction only because  
20 Respondents, without court intervention, were offering *no* process to noncitizens facing  
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23 <sup>8</sup> *Mathews v. Eldridge*, 424 U.S. 319 (1976). Prospective removal from the U.S. implicates  
24 a noncitizen's liberty interests, meaning that *Mathews* is the correct test for procedural due  
25 process in this context, even though the deprivation at issue is distinct. *Trump v. J.G.G.*,  
26 604 U.S. 670, 673 (2025) (per curiam); *see also Flores-Chavez v. Ashcroft*, 362 F.3d 1150,  
27 1160 (9th Cir. 2004).

28 <sup>9</sup> *Sagastizado Sanchez*, 2025 WL 2957002; *Cruz-Medina*, 2025 WL 2841488; *cf. Santamaria Orellana v. Baker*, 2025 WL 2841886 (D. Md. Oct. 7, 2025) (finding due process required IJ review of negative third-country fear screening, though analysis differed where noncitizen had a reinstated removal order under 8 U.S.C. § 1231(a)(5)).

1 third-country removals. Further, Respondents' argument falls flat because the *D.V.D.* Court  
2 approved *even more* process than what Petitioner seeks here.<sup>11</sup> Petitioner's requested  
3 process is far more streamlined and is already provided to noncitizens in credible and  
4 reasonable fear proceedings. *See* 8 U.S.C. § 1225(b)(1)(B)(iii)(III); 8 C.F.R. § 1208.30(g);  
5 8 C.F.R. § 1208.31(g). Rather than demanding some novel or complex procedural  
6 protections, Petitioner argues simply that due process requires third country fear screenings  
7 to be treated like *all* other fear interviews before USCIS, which are reviewable by the IJ.  
8

9  
10 The fact that Respondents now offer *some* process does not mean that the process  
11 afforded is constitutionally sound. *See Flores-Chavez*, 362 F.3d at 1161-62. Petitioner has  
12 been afforded *some* process to challenge his removal to Mexico, a country where he fears  
13 persecution and torture. However, the level of process "appropriate to the case" must  
14 include IJ review of Petitioner's negative fear screening. *J.G.G.*, 604 U.S. at 673. (internal  
15 quotations and citation omitted).  
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### 17 Conclusion

18 For the foregoing reasons, this Court should grant the Petitioner's Motions for a  
19 Temporary Restraining Order and a Preliminary Injunction.  
20

21 Respectfully submitted,

22  
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Dated: November 3, 2025

**CERTIFICATE OF SERVICE**

1  
2 On this 3<sup>rd</sup> day of November 2025, I, Lauren Hodges, electronically filed the  
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4 foregoing document, with the Clerk of the Court by using the CM/ECF system. I further  
5  
6 certify that a copy of this document, and all attachments thereto, will be delivered via  
7  
8 PACER.

9 //s// Lauren Hodges  
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