UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY

PARAMJIT SINGH,

Petitioner,

v.

KRISTI NOEM, in her official capacity as Secretary of the Department of Homeland Security; **PAMELA BONDI**, in her official capacity as Attorney General of the United States; **TODD LYONS**, in his official capacity as Acting Director and Senior Official Performing the Duties of the Director of U.S. Immigration and Customs Enforcement; **SAMUEL OLSON**, in his official capacity as Field Office Director for U.S. Immigration and Customs Enforcement, Enforcement and Removal Operations; **MARC FIELDS**, in his official capacity as County Jailer of Kenton County Detention Center,

Respondents.

Case No. 25-161-DCR

MOTION FOR A TEMPORARY RESTRAINING ORDER

MEMORANDUM OF LAW IN SUPPORT OF PETITION FOR HABEAS CORPUS RELIEF

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF KENTUCKY

PARAMJIT SINGH

Plaintiff(s),

vs. No. CIV

Noem et al.

Defendant(s).

INFORMATION SHEET FOR T.R.O.

Attorney(s) for Plaintiff(s): *(include phone #)*

Luis Angeles, Esq: (321) 334-0568

Attorney(s) for Defendant(s): *(include phone #)*

N/A

Nature of Underlying Claim: *(contract, tort, environment, etc.)*

HABEAS CORPUS

Jurisdiction: *(Cite Statutes)*

28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States Constitution (Suspension Clause)

Precise statement of activity sought to be restrained or compelled:

1) enjoin Respondents from transferring Petitioner outside this district while this matter is pending; and
2) order Petitioner's release from detention or, in the alternative, order enforcement of the previous bond granted by an IJ; or provide Petitioner a constitutionally adequate bond hearing at which DHS bears the burden, within 3 days; and
3) grant such other and further relief as law and justice require.

HEARING

Estimated length of hearing: 1 Hour

Request hearing to be set for: *(Select one)*

◉ Today ○ Tomorrow ○ Within One Week ○ Within Ten Days

NOTICE

Are all parties represented by counsel at this time? ○ Yes ◉ No

Have the opposing party(ies) and their attorney(s) been notified ? ○ Yes ○ No

If answer is yes, when?

If answer is no, why not?

On Oct. 16 2025, I have sent Certified Mail copies of the Habeas and TRO to Respondent(s).

Notice given by: ☐ Phone ☐ Fax ☒ Letter ☐ In Person ☐ Other

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INTRODUCTION

Petitioner, Paramjit Singh, has been a legal permanent resident for over 30 years. On July 30, 2025, Petitioner returned from a trip abroad and was arrested and detained by the Department of Homeland Security ("DHS") at the O'Hare International Airport. Because of an August 18, 2000, conviction in the Union Circuit Court, Union County, Indiana, for theft. Normally, returning legal permanent residents "shall not be regarded as seeking an admission into the United States for purposes of the immigration laws" unless they fall under one of six exceptions under 8 U.S.C. § 1101(a)(13)(C). Here, it appears that DHS argued that Petitioner fell under exception (v) which applies where a noncitizen "has committed an offense identified in section 212(a)(2) [8 USCS § 1182(a)(2)], unless since such offense the alien has been granted relief under section 212(h) or 240A(a) [8 USCS § 1182(h) or 1229b(a)]." DHS bears the burden of proving the exception applies by clear and convincing evidence.

An Immigration Judge ("IJ") disagreed and ordered Petitioner released on a bond in the amount of $10,000. However, DHS filed a Form EOIR-43 that automatically stayed his release while an appeal of the bond is pending. Then, DHS filed an appeal with the Board of Immigration Appeals ("BIA") citing new facts not previously introduced at the bond hearing. Subsequently, while DHS appeal of the bond decision is pending, the IJ *sua sponte* and in violation of the governing regulations, overturns his own bond decision and finds that Petitioner is not eligible for bond. This occurred with no request from either side for reconsideration and no consideration of any legal arguments or evidence. In fact, the short half-page decision doesn't even explain why the IJ reversed his decision. Now, as a result, Petitioner is still stuck in administrative limbo in violation of his constitutional rights. He already proved to an IJ that he is not ineligible for bond. But he remains detained pursuant to the arbitrary application of DHS's

automatic stay. Moreover, because the IJ *sua sponte* reversed his decision, Petitioner has no adequate constitutionally protected mechanism for challenging his detention. The BIA appeal filed by DHS still remains pending. Meanwhile, in light of the IJ's unlawful *sua sponte* reversal, Petitioner is forced to once again litigate his eligibility for bond. Petitioner cannot exhaust his administrative remedies because the IJ's *sua sponte* reversal effectively renders Petitioner's appeal dead on arrival, a decision over which the BIA has no jurisdiction. Meanwhile, Petitioner continues to suffer in detention from his serious brain injury and is separated from the life, family, and community he has built over the last 30 years. The Court should grant injunctive relief ordering his immediate release (or release on the bond amount previously set by the IJ) for the following reasons.

Petitioner has established a likelihood of success. The arbitrary use and application of the automatic stay provision has been found to be a violation of Due Process rights and a violation of the INA by many courts. Moreover, DHS and the Executive Office of Immigration Review's ("EOIR") actions are in violation of the INA and violate Petitioner's Due Process rights because they have placed Petitioner in an administrative limbo with no meaningful access to release.

Second, Petitioner will suffer irreparable harm if the Court does not provide emergent habeas relief. Petitioner suffers from a serious brain injury, and unless this Court grants habeas relief, it is certain that Petitioner will remain detained for an indefinite period of time in violation of his due process rights. Additionally, if this Court does not grant relief, Petitioner will be forced to remain in detention even though he is statutorily eligible for a bond hearing.

Third, the balance between that harm and the harm injunctive relief would cause to the other litigants and the public interest weighs in favor of Petitioner. The potential harm to Petitioner if injunctive relief is not granted is grave. He would be forced to remain confined

despite his statutory right to a bond hearing. In comparison, the harm to Respondents is minimal. Respondents' position regarding the governing detention authority is meritless, and Respondents cannot in good faith argue that release or a constitutionally adequate bond hearing could cause harm.

For these reasons, Petitioner respectfully requests that this Court: 1) enjoin Respondents from transferring Petitioner outside this district while this matter is pending; and 2) order Petitioner's release from detention or, in the alternative, order enforcement of the previous bond granted by an IJ; or provide Petitioner a constitutionally adequate bond hearing at which DHS bears the burden, within 3 days; and 3) grant such other and further relief as law and justice require.

STATEMENT OF FACTS

Petitioner repeats and incorporates by reference each Statement of Facts contained in the Petition for Writ of Habeas Corpus as if fully set forth herein.

STATUTORY BACKGROUND AND LEGAL FRAMEWORK

I. HABEAS RELIEF

To obtain habeas corpus relief, a petitioner must demonstrate that he is "in custody in violation of the Constitution or laws or treaties of the United States." *See* 28 U.S.C. § 2241(c)(3). This Court has habeas corpus jurisdiction to consider the statutory and constitutional grounds for immigration detention that are unrelated to a final order of removal. *See Demore v. Kim*, 538 U.S. 510, 517-18 (2003).

II. DETENTION AUTHORITY UNDER THE INA

INA prescribes three basic forms of detention for noncitizens in removal proceedings. First, 8 U.S.C. § 1226(a) authorizes the detention of noncitizens in standard non-expedited

removal proceedings before an IJ. *See* 8 U.S.C. § 1226(a); 8 U.S.C. § 1229a. Individuals in section 1226(a) detention are entitled to a bond hearing at the outset of their detention, *see* 8 C.F.R. §§ 1003.19(a), 1236.1(d), while noncitizens who have been arrested, charged with, or convicted of certain crimes are subject to mandatory detention, *see* 8 U.S.C. § 1226(c). Second, the INA provides for mandatory detention of noncitizens subject to expedited removal under 8 U.S.C. § 1225(b)(1) and for other recent arrivals seeking admission referred to under 8 U.S.C. § 1225(b)(2). Finally, the INA also provides for detention of noncitizens who are subject to final orders of removal, including individuals in withholding-only proceedings, *see* 8 U.S.C. § 1231(a)–(b). The detention provisions at section 1226(a) and 1225(b)(2) were enacted as part of the Illegal Immigration Reform and Immigrant Responsibility Act ("IIRIRA") of 1996, Pub. L. No. 104-–208, Div. C, §§ 302–03, 110 Stat. 3009-546, 3009–582 to 3009–583, 3009–585. Section 1226(c) was most recently amended earlier this year by the Laken Riley Act ("LRA"), Pub. L. No.119-1, 139 Stat. 3 (2025).

As a general rule, aliens who seek to enter the United States after arriving at a port of entry, such as an airport, are treated as "applicant[s] for admission." 8 U.S.C. § 1225(a)(1). Applicants for admission must demonstrate to the examining immigration officer that they are "clearly and beyond a doubt" entitled to be admitted. *Id.* § 1225(b)(2)(A). An applicant for admission who fails to do so "shall be detained" for removal proceedings. *Id.* Aliens subject to mandatory detention under Section 1225(b)(2)(A) may nevertheless be temporarily paroled into the United States. *See id.* § 1182(d)(5)(A). However, a different set of rules applies to aliens who have become lawful permanent residents ("LPRs") of the United States. LPRs can leave and return to the country more freely than most other aliens. *See Katebi v. Ashcroft*, 396 F.3d 463, 466 (1st Cir. 2005) ("Returning permanent residents are permitted to reenter the country after

foreign travel."). This is because returning legal permanent residents "shall not be regarded as seeking an admission into the United States for purposes of the immigration laws" unless one of six exceptions applies. 8 U.S.C. § 1101(a)(13)(C).

One of those exceptions is if the noncitizen "(v) has committed an offense identified in section 212(a)(2) [8 USCS § 1182(a)(2)], unless since such offense the alien has been granted relief under section 212(h) or 240A(a) [8 USCS § 1182(h) or 1229b(a)]." In other words, "[o]ne way an LPR is considered an applicant for admission at the border is if he 'has committed an offense identified in section 1182(a)(2) of [the Immigration and Nationality Act]. . . .' 8 U.S.C. § 1101(a)(13)(C)(v). Offenses in section 1182(a)(2) are criminal in nature and includes conviction of a crime involving moral turpitude, where the noncitizen has not received a waiver or relief from removal. 8 U.S.C. § 1182(a)(2)(A)(i)(I)." *Kasneci v. Dir. of Bureau of Immigration & Customs Enf't*, No. 12-12349, at *6-8 (E.D. Mich. Aug. 23, 2012).

In removal proceedings in immigration court, DHS bears the burden to establish by clear and convincing evidence that a noncitizen is removable as charged. *Woodby v. INS*, 385 U.S. 276, 286 (1966). Ambiguities must be resolved in the noncitizen's favor. *Moncrieffe v. Holder*, 569 U.S. 184, 190-91 (2013). Once an IJ makes a decision concerning release on bond, an IJ may reconsider that decision unless the BIA is vested with jurisdiction. *See* 8 C.F.R. § 1003.23(b)(1) (2020) (stating that an Immigration Judge may "reconsider any case in which he or she has made a decision, unless jurisdiction is vested with the Board of Immigration Appeals").

With regard to automatic stays, 8 C.F.R. § 1003.19(i)(2) provides:

> Automatic stay in certain cases. In any case in which [the U.S. Department of Homeland Security ("DHS")] has determined that an alien should not be released or has set a bond of $10,000 or more, any order of the immigration judge authorizing release (on bond or otherwise) shall be stayed upon DHS's filing of a notice of intent to appeal the custody redetermination (Form EOIR-43) with the immigration court within one business day of the order, and, except as otherwise provided in 8 CFR 1003.6(c), shall remain in

> abeyance pending decision of the appeal by the Board. The decision whether or not to file Form EOIR-43 is subject to the discretion of the Secretary. On September 5, 2025, the BIA issued a decision in Matter of Yajure Hurtado, 29 I&N Dec. 216 (BIA 2025) holding that, based on the plain language of section 1225(b)(2)(A), IJs lack authority to hear bond requests or to grant bond to aliens who are present in the United States without admission.

"Following an iterative process and consideration of criticism that the automatic stay provision (in its interim rule form) would be invoked absent factual foundation or appropriate individualized case review, the Department of Justice ('DOJ') issued its final rule, as quoted above." *Leal-Hernandez v. Noem*, No. 1:25-cv-02428, 2025 LX 327685, at *5-6 (D. Md. Aug. 24, 2025). Speaking to these concerns, 8 C.F.R. § 1003.6(c)(1) provides in relevant part:

> To preserve the automatic stay, the attorney for DHS shall file with the notice of appeal a certification by a senior legal official that— (i) The official has approved the filing of the notice of appeal according to review procedures established by DHS; and (ii) The official is satisfied that the contentions justifying the continued detention of the alien have evidentiary support, and the legal arguments are warranted by existing law or by a non-frivolous argument for the extension, modification, or reversal of existing precedent or the establishment of new precedent.

On October 2, 2006, the Department of Justice published the final rule and set forth the following context for changes implemented to the final rule following public comment on the interim rule:

> First, in order to allay possible concerns that in some case the automatic stay might be invoked by low-level employees of DHS without supervisory review, or might be invoked without an adequate factual or legal basis, this rule makes two changes in the process for invoking the automatic stay. The final rule provides that the decision to file the Form EOIR-43 (which must be done within one business day of the immigration judge's custody decision) will be subject to the discretion of the Secretary. Under the provisions of the automatic stay rule which are not changed by this final rule, the automatic stay will lapse 10 business days after the issuance of the immigration judge's decision unless DHS files within that time a notice of appeal with the Board presenting DHS's arguments for reversal or modification of the immigration judge's custody decision. This

> rule adds a new requirement that, in order to preserve the automatic stay, a senior legal official of DHS must certify that the official has approved the filing of the notice of appeal to the Board and that there is factual and legal support justifying the continued detention of the alien.
>
> . . . .
>
> Past experience shows that DHS has invoked the automatic stay in only a select number of custody cases. For example, the EOIR statistics indicate that, in FY 2004, the immigration judges conducted some 33,000 custody hearings and the Board adjudicated 1,373 custody appeals. Yet, DHS sought an automatic stay only with respect to 273 aliens in FY 2004—and only 43 aliens in FY 2005.

71 Fed. Reg. 57874, 57878 (Oct. 2, 2006).

STANDARD OF REVIEW

Preliminary injunctions are governed by the four factors that apply set forth in *Ohio Republican Party v. Brunner*, 543 F.3d 357, 361 (6th Cir. 2008) ("In determining whether to stay the TRO, we consider the same factors considered in determining whether to issue a TRO or preliminary injunction." (cleaned up)). Those factors are: (1) whether the movant has a substantial likelihood or probability of success on the merits; (2) whether the movant will suffer irreparable injury if injunctive relief is not granted; (3) whether the injunctive relief would unjustifiably harm a third party; and (4) whether the public interest would be served by issuing the injunctive relief. *Frisch's Rest., Inc. v. Shoney's Inc.*, 759 F.2d 1261, 1263 (6th Cir. 1985).

ARGUMENTS

I. PETITIONER HAS ESTABLISHED A LIKELIHOOD OF SUCCESS ON THE STATUTORY DETENTION

A. Petitioner's Continued Detention Under an Automatic Stay is Unconstitutional

The automatic stay set forth at 8 C.F.R. § 1003.19(i)(2) is *ultra vires* because it exceeds authority conferred by Congress through the INA, and rewrites the INA and creates a new class of noncitizens subject to mandatory detention. As another district court has recently held, "[t]he

automatic stay is a violent distortion of proper, legitimate process whereby the Government, as though by talisman, renders itself at once prosecutor and adjudicator." *Leal-Hernandez*, 2025 LX 327685, at *35 (D. Md. Aug. 24, 2025); *Mohammed H. v. Trump*, No. 25-1576 (JWB/DTS), 2025 LX 17297, at *14-15 (D. Minn. June 17, 2025) ("[a]lthough the Immigration Judge had ordered Petitioner to be released on bond, the Government stayed that order without making any showing of dangerousness, flight risk, or any other factor justifying detention. Simply by fiat—without introducing any proof and without immediate judicial review—the Government effectively overruled the bond decision and kept Petitioner detained. In doing so, the automatic stay rendered Petitioner's continued detention arbitrary and gave him no chance to contest the Government's case for detention."). This deprives noncitizens like Petitioner of release on bond, even when they have demonstrated to the satisfaction of the IJ that they are not a danger to the community or a risk of flight.

Here, Petitioner was granted bond in the amount of $10,000, but was forced to remain in detention because DHS filed an EOIR-43 with the BIA. Like in the other matters that have struck down the use of automatic stays, there was no individualized review of Petitioner's case.

B. DHS and EOIR Have Placed Petitioner in an Administrative Limbo With No Option for Release

As set forth in the Petition, the IJ *sua sponte* reversed his bond decision while DHS' appeal of the bond was (and remains) pending. This is in violation of 8 C.F.R. § 1003.23(b)(1) (2020) (stating that an Immigration Judge may "reconsider any case in which he or she has made a decision, unless jurisdiction is vested with the Board of Immigration Appeals"). As a result, it has left Petitioner stuck in an administrative limbo. By virtue of DHS EOIR-43, he remains detained indefinitely. Furthermore, the IJ's decision to reopen while the BIA appeal remains pending has created uncertainty about the status of the removal proceedings. The governing

regulation makes it clear that the IJ is divested of jurisdiction over bond at this point. Nonetheless, acting on the IJ's improper reconsideration, DHS has asked for withdrawal of its BIA appeal. The BIA has not yet acted on that request. Therefore, Petitioner either has to wait for the BIA to render a decision or be forced to re-litigate the bond issue before the IJ, even though the IJ no longer has jurisdiction over the matter.

C. Continued Detention Violates Petitioner's Rights

The Supreme Court has held that "[T]he Due Process Clause applies to all 'persons' within the United States, including [noncitizens], whether their presence here is lawful, unlawful, temporary, or permanent." *Zadvydas v. Davis,* 533 U.S. 678, 693 (2001). "Freedom from imprisonment--from government custody, detention, or other forms of physical restraint--lies at the heart of the liberty that [the Due Process] Clause protects." *Id.* at 690 (citing *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992)); *see also Mathews v. Diaz*, 426 U.S. 67, 77 (1976) (explaining that due process "protects every [noncitizen] from deprivation of life, liberty, or property without due process of law. Even one whose presence in this country is unlawful, involuntary, or transitory is entitled to that constitutional protection") (internal citations omitted). The adequacy of due process for civil detainees is generally guided by the three-part balancing test articulated in *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976). The *Mathews* factors are: (1) "the private interest that will be affected by the official action"; (2) "the risk of an erroneous deprivation of such interest through the procedures used, and the probable value, if any, of additional or substitute procedural safeguards"; and (3) "the Government's interest, including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail." *Mathews*, 424 U.S. at 335. Petitioner satisfies all three of the factors. As to the first two factors, Petitioner has been deprived of his liberty, erroneously

subjected to continued mandatory detention under § 1225 even though he prevailed at his bond hearing, and is denied due process protections, including the right to seek bond. As to the third *Mathews* factor, the Government has no interest in Petitioner's continued detention. He has been a legal permanent resident for over 30 years with no run-ins with the law except for the 2000 conviction. Mandatory detention is not authorized by § 1225, serves no legitimate purpose, and amounts to punitive detention, warranting habeas relief.

II. PETITIONER WILL SUFFER IRREPARABLE HARM UNLESS THE COURT ISSUES A TEMPORARY RESTRAINING ORDER

A court presented with a request for a temporary restraining order pursuant to Federal Rule of Civil Procedure 65 is authorized to issue a TRO to avoid "immediate and irreparable injury." Fed. R. Civ. P. 65(b)(1)(A). The purpose of a TRO is to "preserv[e] the status quo and prevent[] irreparable harm just so long as is necessary to hold a [preliminary injunction] hearing, and no longer." *Granny Goose Foods, Inc. v. Bhd. of Teamsters & Auto Truck Drivers Local No. 70 of Alameda Cnty.*, 415 U.S. 423, 439 (1974).

Here, the irreparable harm to Petitioner is clearly demonstrated. Absent a Court order preventing his transfer, Petitioner could potentially be transferred at any moment out of this district, and potentially deprive the Court of jurisdiction over this matter. Moreover, unless the Court releases Petitioner (or, in the alternative, releases him in the bond amount previously set by the IJ), Petitioner will be forced to continue in detention while contending with a critical brain condition.

The Government is constitutionally obligated to provide due process. *See Trump v. J.G.G.*, 145 S. Ct. 1003, 1006 (2025) (*per curiam*) ("'It is well established that the Fifth Amendment entitles aliens to due process of law' in the context of removal proceedings.") (quoting *Reno v. Flores*, 507 U.S. 292, 306 (1993). Therefore, it is necessary to grant TRO and

injunctive relief now to prevent these unconstitutional harm from occurring. *See A.A.R.P. v. Trump*, 145 S. Ct. 1364, 1368 (2025) (granting TRO to prevent expedited deportation potentially violative of due process). In addition, the All Writs Act, 28 U.S.C. § 1651(a), empowers the federal courts to "issue all writs necessary or appropriate in aid of their respective jurisdictions and agreeable to the usages and principles of law." The Supreme Court has recognized "a limited judicial power to preserve the court's jurisdiction or maintain the *status quo* by injunction pending review of an agency's action through the prescribed statutory channel." *F.T.C. v. Dean Foods Co.*, 384 U.S. 597, 604 (1966) (citation omitted). As another court has succinctly put it, "[t]his is not a circumstance, put differently, where the harms Petitioners face are so remote—or are simply monetary—as to fail in establishing they face irreparable harm in the Court's TRO analysis." *D.B.U. v. Trump*, 779 F. Supp. 3d 1264, 1283 (D. Colo. 2025).

III. THE BALANCE OF HARMS WEIGHS IN FAVOR OF PETITIONER

The merged "balancing-the-equities" and "public interest" factors favor Petitioner. "The potential harm to Petitioner if the TRO is not granted is serious. If Petitioner is removed from this district without due process, he will be without means to challenge his detention in this Court. Similarly, if Petitioner is not released or promptly provided a bond hearing, he will be forced to continue litigating his asylum claim in detention even though he is statutorily eligible for release on bond. "In comparison, the harm to Respondents is minimal." *Lira v. Noem*, No. 1:25-cv-00855-WJ-KK, 2025 LX 383996, at *11-12 (D.N.M. Sep. 5, 2025). Indeed, "there is a substantial public interest in having governmental agencies abide by the federal laws that govern their existence and operations." *League of Women Voters of U.S. v. Newby*, 838 F.3d 1, 12 (D.C. Cir. 2016). Practically speaking, a TRO would inflict little more on Respondents than ensure they adhere to the requirements of the Constitution.

CONCLUSION

For the foregoing reasons, the Court should grant Petitioner's Motion for TRO and Preliminary Injunction.

Dated: October 16, 2025

Respectfully Submitted,

/S/ Luis Angeles

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VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I represent Petitioner, PARAMJIT SINGH, and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Petition for TEMPORARY RESTRAINING ORDER Corpus are true and correct to the best of my knowledge.

Dated: October 16, 2025

/s/Luis Angeles
Luis Angeles

CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2025, I filed the foregoing petition electronically through the CM/ECF system, which caused all parties or counsel to be served by electronic means as more fully reflected on the Notice of Electronic Filing.

/s/Luis Angeles
Luis Angeles

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY

PARAMJIT SINGH, *Petitioner*, v. **KRISTI NOEM**, in her official capacity as Secretary of the Department of Homeland Security; **PAMELA BONDI**, in her official capacity as Attorney General of the United States; **TODD LYONS**, in his official capacity as Acting Director and Senior Official Performing the Duties of the Director of U.S. Immigration and Customs Enforcement; **SAMUEL OLSON**, in his official capacity as Field Office Director for U.S. Immigration and Customs Enforcement, Enforcement and Removal Operations; **MARC FIELDS**, in his official capacity as County Jailer of Kenton County Detention Center, *Respondents*.	Case No. _____ **CERTIFICATE OF SERVICE**

CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2025, a copy of the foregoing, the Petition for Writ of Habeas Corpus, Doc 1, and the Motion for a Temporary Restraining Order, Doc. 2, was served on each of the individual respondents.

Dated: October 16, 2025

Respectfully Submitted,

/S/ Luis Angeles

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CONVENTIONAL SERVICE

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