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DETAINED – ICE – ELIZABETH, NJ

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

SANDRA R. VASQUEZ LUCERO)

A )

Petitioner,)

v.)

)

PAM BONDI,)

Attorney General of the)

United States of America, and,)

)

KRISTI NOEM,)

Secretary of the Department of)

Homeland Security, (DHS) and,)

)

TODD LYONS,)

Acting Director,)

United States Immigration and)

Customs Enforcement (ICE),)

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)

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Civil Action No. 1:25-cv-16737

**PETITION FOR
ORDER TO SHOW CAUSE**

1. Pursuant to 28 U.S.C. § 2243, Petitioner respectfully requests that this Court “forthwith” issue an order directing Respondents to show cause why the petition for a writ of habeas corpus filed by Petitioner pursuant to 28 U.S.C. § 2241 should not be granted.

2. Petitioner challenges her arbitrary detention by the Department of Homeland Security. *See* Petition for Writ of Habeas Corpus, Dkt. No. 1.

3. The federal habeas corpus statute provides that “[a] court, justice or judge entering a writ of habeas corpus shall forthwith award the writ or issue an order directing the respondent to

show cause why the writ should not be granted, unless it appears from the application that the applicant or person detained is not entitled thereto.” 28 U.S.C. § 2243.

4. Section 2243 further provides that the writ or order to show cause “shall be returned within three days unless for good cause additional time, not exceeding twenty days, is allowed.”

5. Section 2243 further provides that the court shall hold a hearing on the writ or order to show cause “not more than five days after the return unless for good cause additional time is allowed.”

6. In addition, Section 2243 states that the court “shall summarily hear and determine the facts, and dispose of the matter as law and justice require.”

7. Pursuant to Section 2243, Petitioner requests that the Court immediately issue an Order to Show Cause directing Respondents to file a return within three days of the Court’s order, showing cause, if any, why the writ of habeas corpus should not be granted, and to provide Petitioner an opportunity to file a reply within 3 days after Respondents file the return.

Respectfully submitted,

/s/ Kerry W. Hartington

KERRY W. HARTINGTON
Counsel for the Petitioner
October 24, 2025