

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
DETROIT, MICHIGAN**

Carlos Martinez Ramirez,

Petitioner,

v.

KRISTI NOEM, Secretary,
U.S. Department
of Homeland Security;
TODD LYONS,
Acting Director, U.S. Immigration
and Customs
Enforcement; KEVIN RAYCRAFT, Acting
Field Office Director, Detroit Immigration
and Customs Enforcement; PAM BONDI,
U.S. Attorney General, U.S. Department of Justice,
SIRCE E. OWEN, Acting Director of the
Executive Office of Immigration Review, and
ANNA C. LITTLE, Acting EOIR Chief
Immigration Judge,

Case No. 25-13444

Hon.Judge: Thomas L.Ludington

Mag. Judge: Curtis Ivy, Jr.

Respondents.

**URGENT
NOTIFICATION OF NEW AUTHORITY
AND CLASS MEMBERSHIP**

U.S. District Court for the Central District of California certified a nationwide class which includes the Petitioner. (See attached order) The Court issued this order yesterday, November 25, 2025. *Lazaro Maldonado Bautista et. al. v. Ernesto Santacruz, Jr, et,al*, 5:25-cv-01873-SSS-BFM, (CDC Nov. 25, 2025) (*Bautista v. Santacruz*)

The Petitioner is part of the Bond Eligible Class which includes “All noncitizens in the United States without lawful status who (1) have entered or will enter the United States without inspection; (2) were not or will not be apprehended upon arrival; and (3) are not or will not be subject to detention under 8 U.S.C. §1226(c), §1225(b)(1) or §1231 at the time the Department of Homeland Security makes an initial custody determination.” *Baustista v. Santacruz*, Page ID 1447 and 1460. In that order the Court found that class members are not subject to mandatory detention and are entitled to a bond hearing. *Id.* at PAGEID1458.

Ramirez entered the U.S. on or about April of 2002. He has resided in the U.S. for approximately 23 years. At that time of entry, Ramirez was not apprehended.

He is not subject to detention under:

8 U.S.C. §1226(c) – Detention of criminal aliens. The Petitioner is not a criminal alien.

8 U.S.C. §1225(b)(1) - Inspection of aliens arriving in the United States and certain other aliens who have not been admitted or paroled. The Petitioner is not an alien arriving in the U.S. He has been here for over two decades.

8 U.S.C. §1231- Alien who has been ordered removed. The Petitioner has never been ordered removed.

Ramirez is a member of the class certified in Lazaro Maldonado Bautista et. al. v. Ernesto Santacruz, Jr, et,al, 5:25-cv-01873-SSS-BFM, (CDC Nov. 25, 2025) and as such should be granted a bond hearing or released.

THEREFORE, the Petitioner respectfully requests that this Court:

a. Respondent EOIR hold a bond hearing within 5 days or release the Petitioner immediately;

c. Find that the Respondents have acted in bad faith in violating the U.S. Constitution and the INA;

d. Award Plaintiffs their costs and reasonable attorneys' fees in this action.

e. Any other relief the Court deems appropriate.

Respectfully submitted:

 s/Caridad Pastor
Caridad Pastor C (P43551)
Pastor and Associates, P.C.
Attorneys for Petitioner
11 Broadway Suite 1005
New York, New York 10004
(248) 619-0065
carrie@pastorandassociates.com

Dated: November 26, 2025

CERTIFICATE OF SERVICE

I, Caridad Pastor, do hereby certify that today, I filed the foregoing document by the ECMF court filing system which will serve all parties in this action.

Respectfully submitted:

 s/Caridad Pastor
Caridad Pastor C (P43551)
Pastor and Associates, P.C.
Attorneys for Petitioner
11 Broadway Suite 1005
New York, New York 10004
(248) 619-0065
carrie@pastorandassociates.com

Dated: November 26, 2025