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Jeremy Mondejar, ESQ.
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Telephone: (702) 816-6611
Attorney for Petitioner

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

GARCIA-ARAUZ, JUSTIN
Petitioner,
V.
KRISTI NOEM, Secretary of
the United States Department of Homeland
Security; PAM BONDI,
United States Attorney General;
TODD LYONS, Director of
United States Immigration and Customs
Enforcement; BRYAN WILCOX,
Field Office Director for Detention and
Removal, U.S. Immigration and Customs
Enforcement, Department of Homeland
Security; John Mattos Warden,
Nevada Southern Detention Center;
UNITED STATES DEPARTMENT OF
HOMELAND SECURITY; UNITED
STATES IMMIGRATION AND
CUSTOMS ENFORCEMENT;
Respondents

A  Detained
Case File No.: 2:25-cv-02117-RFB-EJY
Immigration file No.:


**PETITIONER'S REPLY
TO RESPONDENT'S
OPPOSITION TO
MOTION FOR
PRELIMINARY
INJUNCTION**

Respondents claim that Petitioner is being detained under 8 U.S.C. § 1225.
That is simply not true. Petitioner is being detained under 8 C.F.R. §1003.19,
which automatically stayed the IJ's bond grant when DHS appealed the bond
decision. As stated in the Petition, the IJ granted bond in the amount of \$5,000 on
September 03, 2025. *See, Exhibit A*, ECAS screenshot of bond proceedings. Upon
information and belief, the IJ did not issue a written decision.

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1. Issue an injunction that enjoins Respondents from staying his bond under 8 C.F.R. §1003.19;

2. Issue an order as to Petitioner, requiring that Respondents release him or allow him to post his \$5,000.00 bond within 24 hours;

3. Issue an injunction the enjoins Respondents from reversing the Immigration Judge’s Bond Grant based on *Matter of Hurtado* or any other provision for mandatory detention under the INA.

Respectfully submitted,

/s/ Jeremy Mondejar

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