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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Jose Rene CORNEJO-MEJIA
(also known as Jose Rene Cornejo-Mejia),

Petitioner,

v.

Michael BERNACKE, Field Office Director of
Enforcement and Removal Operations, Salt
Lake City Field Office, Immigration and
Customs Enforcement; Kristi NOEM,
Secretary, U.S. Department of Homeland
Security; U.S. DEPARTMENT OF
HOMELAND SECURITY; Pamela BONDI,
U.S. Attorney General; EXECUTIVE OFFICE
FOR IMMIGRATION REVIEW; Reggie
RADER, Police Chief, Henderson Detention
Center,

Respondents.

Case No. 25-2139

**PETITION FOR WRIT OF
HABEAS CORPUS PURSUANT TO
28 U.S.C. §2241**

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INTRODUCTION

1. This petition challenges the ongoing and unlawful detention of Jose Rene Cornejo-Mejia, a long-time Nevada resident and father of three U.S. citizen children, who remains confined at the Henderson Detention Center under the Department of Homeland Security’s (“DHS”) new, overbroad interpretation of the Immigration and Nationality Act (“INA”). Despite his deep ties, Petitioner has been held in immigration detention since approximately September 30, 2025.

2. On September 30, 2025, while driving in Las Vegas, Nevada, Mr. Cornejo Mejia was stopped by local police for unpaid traffic tickets. The stop led to his brief arrest under a minor bench warrant related to those tickets. Following clearance of the local matter, Immigration and Customs Enforcement (ICE) took custody of Mr. Cornejo Mejia under an immigration detainer. He was transferred to the Henderson Detention Center.

3. Petitioner was arrested in Las Vegas — far from any port of entry — and placed in removal proceedings under 8 U.S.C. § 1229a. He is not subject to expedited removal under § 1225(b)(1), nor to post-order detention under § 1231(a).

4. Nevertheless, on October 27, 2025, an Immigration Judge “IJ” denied bond, finding that Matter of Yajure Hurtado, 29 I&N Dec. 216 (BIA 2025), required his detention under § 1225(b)(2). This conclusion disregards decades of statutory interpretation and agency practice recognizing that individuals arrested in the interior fall under § 1226(a) and are entitled to bond hearings.

5. The United States District Court for the District of Nevada recently rejected this very policy in *Maldonado Vazquez v. Feeley*, No. 2:25-cv-01542-RFB-EJY (D. Nev. Sept. 17,

1 2025), finding DHS's invocation of § 1225(b)(2) and the EOIR-43 automatic stay unconstitutional
2 and contrary to the INA.

3 6. Respondents' newly asserted interpretation is plainly contrary to the statutory
4 framework and irreconcilable with decades of agency practice, which have consistently applied §
5 1226(a) and its implementing regulation, 8 C.F.R. § 236.1, to individuals like Petitioner—long-
6 term residents arrested in the interior and placed in removal proceedings under § 240.

7 7. Petitioner seeks a writ ordering his release, or in the alternative, a prompt custody
8 redetermination hearing under § 1226(a), free from the unlawful restrictions imposed by *Yajure*
9 *Hurtado* and 8 C.F.R. § 1003.19(i)(2).

10 JURISDICTION

11 8. Petitioner is in the physical custody of Respondents and detained at the Henderson
12 Detention Center in Henderson, Nevada.

13 9. This Court has jurisdiction under 28 U.S.C. § 2241(c)(5) (habeas corpus), 28 U.S.C.
14 § 1331 (federal question), and Article I, section 9, clause 2 of the United States Constitution (the
15 Suspension Clause).

16 10. This Court may grant relief pursuant to 28 U.S.C. § 2241, the Declaratory Judgment
17 Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.

18 VENUE

19 11. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 493-
20 500 (1973), venue lies in the United States District Court for the District of Nevada, the judicial
21 district in which Petitioner currently is detained.

1 12. Venue is also properly in this Court pursuant to 28 U.S.C. § 1391(e) because
2 Respondents are employees, officers, and agencies of the United States, and because a substantial
3 part of the events or omissions giving rise to the claims occurred in the District of Nevada.

4 **REQUIREMENTS OF 28 U.S.C. § 2243**

5 13. The Court must grant the petition for writ of habeas corpus or order Respondents
6 to show cause “forthwith,” unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an
7 order to show cause is issued, the Respondents must file a return “within three days unless for
8 good cause additional time, not exceeding twenty days, is allowed.” *Id.*

9 14. Habeas corpus is “perhaps the most important writ known to the constitutional
10 law . . . affording as it does a *swift* and imperative remedy in all cases of illegal restraint or
11 confinement.” *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added). “The application for the
12 writ usurps the attention and displaces the calendar of the judge or justice who entertains it and
13 receives prompt action from him within the four corners of the application.” *Yong v. I.N.S.*, 208
14 F.3d 1116, 1120 (9th Cir. 2000) (citation omitted).

15 **PARTIES**

16 15. Petitioner, Jose Rene Cornejo-Mejia, is a 34-year-old national of El Salvador, born
17 on , in Usulután, El Salvador. He entered the United States through Texas on or about
18 September 11, 2012, without inspection, and has since resided continuously in the country for
19 more than twelve years.

20 16. Respondent Michael Bernacke is the Director of the Salt Lake City Field Office of
21 ICE’s Enforcement and Removal Operations division. As such, Michael Bernacke is Petitioner’s
22 immediate custodian and is responsible for Petitioner’s detention and removal. He is named in his
23 official capacity.

1 17. Respondent Kristi Noem is the Secretary of the Department of Homeland Security.
2 She is responsible for the implementation and enforcement of the Immigration and Nationality Act
3 (INA), and oversees ICE, which is responsible for Petitioner's detention. Ms. Noem has ultimate
4 custodial authority over Petitioner and is sued in her official capacity.

5 18. Respondent Department of Homeland Security (DHS) is the federal agency
6 responsible for implementing and enforcing the INA, including the detention and removal of
7 noncitizens.

8 19. Respondent Pamela Bondi is the Attorney General of the United States. She is
9 responsible for the Department of Justice, of which the Executive Office for Immigration Review
10 and the immigration court system it operates is a component agency. She is sued in her official
11 capacity.

12 20. Respondent Executive Office for Immigration Review (EOIR) is the federal agency
13 responsible for implementing and enforcing the INA in removal proceedings, including for custody
14 redeterminations in bond hearings.

15 21. Respondent, Reggie Radar, is employed by the City of Henderson, and serves as
16 Police Chief of the Henderson Detention Center in Henderson, Nevada, where Petitioner is
17 detained. He has immediate physical custody of Petitioner. He is sued in his official capacity.

18 LEGAL FRAMEWORK

19 22. The INA prescribes three basic forms of detention for the vast majority of
20 noncitizens in removal proceedings.

21 23. First, 8 U.S.C. § 1226 authorizes the detention of noncitizens in standard removal
22 proceedings before an IJ. *See* 8 U.S.C. § 1229a. Individuals in § 1226(a) detention are generally
23 entitled to a bond hearing at the outset of their detention, *see* 8 C.F.R. §§ 1003.19(a), 1236.1(d),
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1 while noncitizens who have been arrested, charged with, or convicted of certain crimes are subject
2 to mandatory detention, *see* 8 U.S.C. § 1226(c).

3 24. Second, the INA provides for mandatory detention of noncitizens subject to
4 expedited removal under 8 U.S.C. § 1225(b)(1) and for other recent arrivals seeking admission
5 referred to under § 1225(b)(2).

6 25. Last, the INA also provides for detention of noncitizens who have been ordered
7 removed, including individuals in withholding-only proceedings, *see* 8 U.S.C. § 1231(a)–(b).

8 26. This case concerns the detention provisions at §§ 1226(a) and 1225(b)(2).

9 27. The detention provisions at § 1226(a) and § 1225(b)(2) were enacted as part of the
10 Illegal Immigration Reform and Immigrant Responsibility Act (IIRIRA) of 1996, Pub. L. No. 104-
11 –208, Div. C, §§ 302–03, 110 Stat. 3009–546, 3009–582 to 3009–583, 3009–585. Section 1226(a)
12 was most recently amended earlier this year by the Laken Riley Act, Pub. L. No. 119-1, 139 Stat.
13 3 (2025).

14 28. Following the enactment of the IIRIRA, EOIR drafted new regulations explaining
15 that, in general, people who entered the country without inspection were not considered detained
16 under § 1225 and that they were instead detained under § 1226(a). *See* Inspection and Expedited
17 Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal Proceedings; Asylum
18 Procedures, 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997).

19 29. Thus, in the decades that followed, most people who entered without inspection
20 and were placed in standard removal proceedings received bond hearings, unless their criminal
21 history rendered them ineligible. That practice was consistent with many more decades of prior
22 practice, in which noncitizens who were not deemed “arriving” were entitled to a custody hearing
23 before an IJ or other hearing officer. *See* 8 U.S.C. § 1252(a) (1994); *see also* H.R. Rep. No. 104-
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1 469, pt. 1, at 229 (1996) (noting that § 1226(a) simply “restates” the detention authority previously
2 found at § 1252(a)).

3 30. On July 8, 2025, ICE, “in coordination with” DOJ, announced a new policy that
4 rejected well-established understanding of the statutory framework and reversed decades of
5 practice.

6 31. The new policy, entitled “Interim Guidance Regarding Detention Authority for
7 Applicants for Admission,”¹ claims that all persons who entered the United States without
8 inspection shall now be deemed “applicants for admission” under 8 U.S.C. § 1225, and therefore
9 are subject to the mandatory detention provision under § 1225(b)(2)(A). The policy applies
10 regardless of when a person is apprehended and affects those who have resided in the United States
11 for months, years, and even decades.

12 32. In a May 22, 2025, unpublished decision from the Board of Immigration Appeals
13 (BIA), EOIR adopts this same position.² That decision holds that all noncitizens who entered the
14 United States without admission or parole are considered applicants for admission and are
15 ineligible for IJ bond hearings.

16 33. That position was formalized in Matter of Yajure Hurtado, 29 I&N Dec. 216 (BIA
17 2025), which rejected decades of contrary practice and held that § 1225(b)(2), not § 1226(a),
18 governs detention of EWIs.

19 34. Federal courts have rejected this exact conclusion. In *Rodriguez Vazquez v. Bostock*,
20 --- F. Supp. 3d --- 2025 WL 1193850 (W.D. Wash. Apr. 24, 2025) the court held that § 1226(a)
21 applies to long-settled residents arrested in the interior; *see also* *Gomes v. Hyde*, No. 1:25-CV-

23 ¹ Available at <https://www.aila.org/library/ice-memo-interim-guidance-regarding-detention-authority-for-applications-for-admission>.

24 ² Available at <https://nwirp.org/our-work/impact-litigation/assets/vazquez/59-1%20ex%20A%20decision.pdf>.

1 11571-JEK, 2025 WL 1869299, at *8 (D. Mass. July 7, 2025) (granting habeas petition based on
2 same conclusion).

3 35. Most recently, this court, District of Nevada in *Maldonado Vazquez v. Feeley*, No.
4 2:25-cv-01542-RFB-EJY (D. Nev. Sept. 9, 2025), held that EOIR’s automatic stay regulation, 8
5 C.F.R. § 1003.19(i)(2) (Form EOIR-43), is unconstitutional because it deprives noncitizens of
6 liberty without due process. The court ordered same-day release of the petitioner and noted that
7 DHS’s reliance on § 1225(b)(2) to detain long-settled residents raises serious statutory and
8 constitutional concerns.

9 36. As *Rodriguez Vazquez*, *Gomes*, and *Maldonado* demonstrate, the text and structure
10 of the INA make clear that § 1226(a) applies to noncitizens apprehended in the interior, including
11 those charged as inadmissible for entry without inspection.

12 37. Section 1226(a) applies by default to all persons “pending a decision on whether
13 the [noncitizen] is to be removed from the United States.” These removal hearings are held under
14 § 1229a, to “decid[e] the inadmissibility or deportability of a[] [noncitizen].”

15 38. By contrast, § 1225(b) applies to people arriving at U.S. ports of entry or who
16 recently entered the United States. The statute’s entire framework is premised on inspections at
17 the border of people who are “seeking admission” to the United States. 8 U.S.C.
18 § 1225(b)(2)(A). Indeed, the Supreme Court has explained that this mandatory detention scheme
19 applies “at the Nation’s borders and ports of entry, where the Government must determine whether
20 a[] [noncitizen] seeking to enter the country is admissible.” *Jennings v. Rodriguez*, 583 U.S. 281,
21 287 (2018).

1 39. Accordingly, the mandatory detention provision of § 1225(b)(2) does not apply to
2 people like Petitioner, who have already entered and were residing in the United States at the time
3 they were apprehended.

4 **FACTS**

5 40. Petitioner, Jose Rene Cornejo-Mejia, is a 34-year-old national of El Salvador, born
6 on [REDACTED], in Usulután, El Salvador. He entered the United States through Texas on or about
7 September 11, 2012, without inspection, and has since resided continuously in the country for
8 more than twelve years.

9 41. Before his detention, Mr. Cornejo Mejía lived in Las Vegas, Nevada, where he
10 maintained long-term residence and steady employment in the construction and remodeling trades,
11 including work for Lía Construction and CC Tile Inc. Supervisors and coworkers describe him as
12 hardworking, punctual, and dependable. He has supported his household and three U.S. citizen
13 children consistently and without interruption.

14 42. Mr. Cornejo Mejía shares custody of his children with his former long-term partner,
15 Gabriela S [REDACTED] I [REDACTED] P [REDACTED] and has maintained a stable relationship for the past two years with
16 Elsa Q., who resides with him in Las Vegas.

17 43. He is the father of three U.S. citizen children: S.M.I., born [REDACTED]; A.S.M.I.,
18 born [REDACTED]; and F.I.P., born [REDACTED]

19 44. All three children were born in Nevada and rely on their father as their primary
20 financial and emotional support.

21 45. On September 30, 2025, while driving in Las Vegas, Nevada, Mr. Cornejo Mejía
22 was stopped by local police for unpaid traffic tickets. The stop led to his brief arrest under a minor
23 bench warrant related to those tickets. Following clearance of the local matter, Immigration and
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1 Customs Enforcement (ICE) took custody of Mr. Cornejo Mejía under an immigration detainer.
2 He was transferred to the Henderson Detention Center, where he remains detained pending
3 removal proceedings.

4 46. DHS placed Petitioner in removal proceedings before the Las Vegas Immigration
5 Court pursuant to 8 U.S.C. § 1229a. ICE has charged Petitioner with, inter alia, being inadmissible
6 under 8 U.S.C. § 1182(a)(6)(A)(i) as a noncitizen who entered the United States without being
7 admitted or paroled, and under 8 U.S.C. § 1182(a)(7)(A)(i)(I) as an immigrant not in possession
8 of a valid unexpired immigrant visa or other valid entry document at the time of application for
9 admission. **Exhibit A.**

10 47. Petitioner has no criminal record, no pending charges, and no prior immigration
11 violations. His only immigration infraction dates back to his initial entry without inspection in
12 2012, after which he has lived continuously and lawfully, integrating into U.S. society.

13 48. Following Petitioner's arrest and transfer to Henderson Detention Center, in
14 Henderson, Nevada, ICE issued a custody determination to continue Petitioner's detention without
15 an opportunity to post bond or be released on other conditions.

16 49. Petitioner subsequently requested a bond redetermination hearing before an IJ on
17 October 23, 2025, and the matter was set for a hearing on October 27, 2025. **Exhibit B.**

18 50. On October 27, 2025, IJ Ann McDermott of the Las Vegas Immigration Court
19 denied bond, stating: "The respondent entered without admission, inspection or parole. He is an
20 applicant for admission. Based on the plain language of section 235(b)(2)(A) of the Immigration
21 and Nationality Act, 8 U.S.C. § 1225(b)(2)(A) (2018). Matter of Yajure Hurtado, 9 I&N Dec. 216
22 (BIA 2025). Immigration Judges lack authority to hear bond requests or to grant bond to aliens
23 who are present in the United States without admission." **Exhibit C.**

1 51. The IJ declined to make an alternate finding of whether Mr. Cornejo-Mejia is a
2 danger to the community or a flight risk. Petitioner by and through counsel reserved appeal, and
3 the government waived appeal.

4 52. Petitioner's detention under *Yajure Hurtado* exemplifies DHS's unlawful
5 expansion of 8 U.S.C. § 1225(b)(2) to long-term residents apprehended in the interior. Multiple
6 federal courts — including the U.S. District Court for the District of Nevada — have found the
7 government's interpretation unlikely to withstand judicial review. In *Maldonado Vazquez v. Feeley*,
8 No. 2:25-cv-01542-RFB-EJY (D. Nev. Sept. 17, 2025), Judge Boulware II granted a preliminary
9 injunction, concluding that DHS's reliance on § 1225(b)(2) for interior arrests and the automatic-
10 stay procedure under 8 C.F.R. § 1003.19(i)(2) “violates due process both facially and as applied.”
11 The court emphasized that the government's statutory theory “contradicts the text, structure, and
12 decades of practice under § 1226(a).” Declaratory relief on the scope of § 1225(b)(2) remains
13 pending in several cases, including *Bautista v. Noem*, No. 5:25-cv-01873-SSS-BFM (C.D. Cal.),
14 but the weight of judicial opinion indicates that DHS's current interpretation cannot be sustained.

15 53. Petitioner's record shows nearly a decade of stable residence, longstanding
16 employment, strong familial U.S. roots, and a complete absence of criminal conduct. Letters from
17 community members and relatives uniformly attest to his integrity, non-violence, and long-
18 standing role as a pillar of stability for his family and community. Taken together, Respondent's
19 detention lacks any statutory trigger for mandatory custody and stands in stark contrast to his
20 durable presence, clean record, documented contributions, and humanitarian equities. **Exhibit B.**

21 54. Any further appeal within the administrative system is futile. On September 5, 2025,
22 the BIA issued Matter of Yajure Hurtado, 29 I&N Dec. 216 (BIA 2025), adopting DHS's position
23 that all noncitizens who entered without inspection are “applicants for admission” subject to §
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1 1225(b)(2) mandatory detention. The Department of Justice has repeatedly defended this
2 interpretation in federal court, including in *Rodriguez Vazquez v. Bostock*, No. 3:25-cv-05240-
3 TMC (W.D. Wash. June 6, 2025), Dkt. 49 at 27–31.

4 55. Without relief from this Court, Petitioner faces prolonged, unlawful detention,
5 separated from his U.S. citizen daughters, including a National Guard recruit and a child in active
6 therapy, despite an undisputed record showing he poses no danger and no flight risk.

7 **CLAIMS FOR RELIEF**

8 **COUNT I**

9 **Violation of the INA**

10 56. Petitioner incorporates by reference the allegations of fact set forth in the preceding
11 paragraphs.

12 57. The mandatory detention provision at 8 U.S.C. § 1225(b)(2) does not apply to long-
13 settled noncitizens apprehended in the interior of the United States. By its plain text, § 1225(b)(2)
14 applies to individuals who are apprehended at the border or ports of entry as “applicants for
15 admission.” By contrast, § 1226(a) governs the detention of noncitizens, including those charged
16 as inadmissible under § 1182(a)(6)(A)(i), who are placed in § 1229a removal proceedings after
17 residing in the country

18 58. Federal courts have repeatedly rejected DHS’s recent attempt to apply § 1225(b)(2)
19 to persons like Petitioner. See *Rodriguez Vazquez v. Bostock*, --- F. Supp. 3d ---, 2025 WL 1193850
20 (W.D. Wash. Apr. 24, 2025); *Gomes v. Hyde*, No. 1:25-cv-11571-JEK, 2025 WL 1869299 (D.
21 Mass. July 7, 2025); *Maldonado Vazquez v. Feeley*, No. 2:25-cv-01542-RFB-EJY (D. Nev. Sept.
22 9, 2025). These courts have confirmed that § 1226(a), not § 1225(b)(2), governs detention for
23 noncitizens apprehended after residing in the United States.

1 59. The Board of Immigration Appeals’ recent decision in Matter of Yajure Hurtado,
2 29 I&N Dec. 216 (BIA 2025), adopting DHS’s contrary position, does not bind this Court. *Yajure*
3 *Hurtado* represents an abrupt, unexplained reversal of decades of agency practice and is not
4 entitled to deference.

5 60. Accordingly, Respondents’ application of § 1225(b)(2) to Petitioner is contrary to
6 the statutory framework of the INA, exceeds their lawful authority, and unlawfully mandates his
7 continued detention.

8 **COUNT II**

9 **Violation of Due Process**

10 61. Petitioner repeats, re-alleges, and incorporates by reference each and every
11 allegation in the preceding paragraphs as if fully set forth herein.

12 62. The government may not deprive a person of life, liberty, or property without due
13 process of law. U.S. Const. amend. V. “Freedom from imprisonment—from government custody,
14 detention, or other forms of physical restraint—lies at the heart of the liberty that the Clause
15 protects.” *Zadvydas v. Davis*, 533 U.S. 678, 690, 121 S.Ct. 2491, 150 L.Ed.2d 653 (2001).

16 63. Petitioner has a fundamental interest in liberty and being free from official restraint.

17 64. On October 27, 2025, IJ Ann McDermott of the Las Vegas Immigration Court
18 issued a decision denying bond to Petitioner, Mr. Cornejo-Mejia. The IJ concluded that he is “an
19 applicant for admission” with reliance on the Board’s decision in Matter of Yajure Hurtado, 29
20 I&N Dec. 216 (BIA 2025), which reclassified all individuals who entered without inspection as
21 “applicants for admission” subject to mandatory detention under 8 U.S.C. § 1225(b)(2). On that
22 basis, the IJ held that she lacked jurisdiction to grant a bond under § 1226(a). This decision mirrors
23 the statutory and constitutional issues now under review in *Maldonado Vazquez v. Feeley*, No.
24 2:25-cv-01542-RFB-EJY (D. Nev. Sept. 17, 2025), where the district court found the

1 government's interpretation of § 1225(b)(2) and its reliance on the EOIR-43 automatic stay to be
2 inconsistent with the INA and violative of due process.

3 65. Because the IJ concluded he lacked jurisdiction under 8 U.S.C. § 1226(a), DHS did
4 not file Form EOIR-43 to invoke the automatic stay under 8 C.F.R. § 1003.19(i)(2). Instead, the
5 government waived the appeal, while the Petitioner reserved the appeal of the IJ's jurisdictional
6 finding.

7 66. Petitioner's ongoing confinement, based solely on an administrative interpretation
8 of statutory authority, deprives him of liberty without any individualized judicial determination.

9 67. This posture highlights the same constitutional infirmities identified by federal
10 courts reviewing the government's new application of § 1225(b)(2) and the automatic-stay
11 framework. In *Maldonado Vazquez v. Feeley*, No. 2:25-cv-01542-RFB-EJY (D. Nev. Sept. 17,
12 2025), the court held that DHS's reliance on § 1225(b)(2) for interior arrests, coupled with EOIR's
13 automatic-stay regulation, "violates due process both facially and as applied," and emphasized that
14 the government's statutory theory contradicts the text, structure, and decades of practice under §
15 1226(a).

16 68. Here, although no automatic stay was filed, the deprivation is functionally identical:
17 Petitioner remains detained solely because the IJ believed *Yajure Hurtado* precluded jurisdiction,
18 despite clear findings that he poses no risk of flight or danger. This continued detention violates
19 the Due Process Clause of the Fifth Amendment, as it serves no legitimate governmental purpose
20 and results from a legally erroneous and constitutionally suspect interpretation of the Immigration
21 and Nationality Act.

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PRAYER FOR RELIEF

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WHEREFORE, Petitioner prays that this Court grant the following relief:

- a. Assume jurisdiction over this matter;
- b. Issue a writ of habeas corpus requiring Respondents release Petitioner or provide Petitioner with a constitutionally adequate bond hearing under 8 U.S.C. § 1226(a) within seven (7) days before a neutral decisionmaker, without application of the automatic stay provision in 8 C.F.R. § 1003.19(i)(2); or the binding effect of Matter of Yajure Hurtado, 29 I&N Dec. 216 (BIA 2025).
- c. Enjoin Respondents from invoking or applying the EOIR-43 automatic stay regulation, 8 C.F.R. § 1003.19(i)(2), to override the Immigration Judge’s custody determinations;
- d. Award Petitioner attorney’s fees and costs under the Equal Access to Justice Act (EAJA), 28 U.S.C. § 2412, and on any other basis justified under law; and
- e. Grant any other and further relief that this Court deems just and proper.

RESPECTFULLY SUBMITTED,

/s/Daniel F. Lippmann
BY: DANIEL F. LIPPMANN, ESQ.

Dated: October 30, 2025.