

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

YOHANDER JOSE LEON LOPEZ,

Petitioner,

v.

ROBERT LYNCH, Detroit Field Office
Director for U.S. Immigration and Customs
Enforcement, in his official capacity; TODD
LYONS, Acting Director of U.S. Immigration
and Customs Enforcement, in his official
capacity; and KRISTI NOEM, Secretary of the
U.S. Department of Homeland Security, in her
official capacity,

Respondents.

Case No. 1:25-cv-1379-PLM-PJG

Hon. Paul L. Maloney
United States District Court Judge

Hon Phillip J. Green
United States Magistrate Judge

REPLY IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS

The Petitioner, who has no criminal history and is fully compliant with all immigration court requirements while his legal process goes forward, is lawfully seeking asylum in the United States as is his right pursuant to 8 U.S.C. § 1158. [REDACTED]

[REDACTED] broke into his home and beat him so badly that they almost killed him. **[Exhibit 1 — Photos of Petitioner’s Injuries/Hospitalization]**

Liberty is one of the most basic and fundamental rights afforded under the Bill of Rights, and “[f]reedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the very liberty that [the Due Process Clause] protects.” *Zadvydas v. Davis*, 533 U.S. 678, 690, 121 S.Ct. 2491, 150 L.Ed.2d 653 (2001). The

Due Process Clause extends to all “persons” regardless of status, including non-citizens whether they are present in the United States lawfully, unlawfully, temporarily, or permanently. *Id.* at 693, 121 S.Ct. 2491; *see also Reno v. Flores*, 507 U.S. 292, 306, 113 S.Ct. 1439, 123 L.Ed.2d 1 (1993); *Chavez-Acosta v. Garland*, No. 22-3045, 2023 WL 246837, at *4 (6th Cir. Jan. 18, 2023). At the heart of the Fifth Amendment is the right to be free from deprivation of life, liberty or property without due process of law. U.S. Const. Amend. V.

None of the jurisdiction-stripping provisions of the Immigration and Nationality Act preclude the Court’s jurisdiction over the Petitioner’s habeas claim. *See, e.g., Ozturk v. Trump*, 779 F.Supp.3d 462, 484 (D. Vermont April 18, 2025) (holding that the court had jurisdiction to consider a noncitizen’s habeas petition challenging her arrest and detention under the First Amendment, the Due Process Clause, and the Administrative Procedure Act (APA) as her detention did not “arise from” removal proceedings within meaning of INA provisions limiting courts’ jurisdiction over questions and claims “arising from the decision or action by the Attorney General to commence proceedings, adjudicate cases, or execute removal orders”).

The Petitioner’s detention occurred in violation of the consent decree in *Castañon Nava et al. v. Dep’t of Homeland Security et al.*, No. 18-cv-3757-RRP, the enforcement of which is currently ongoing in the Northern District of Illinois. Indeed, the Respondents essentially admit as much, in that the Declaration of Detroit ICE Enforcement and Removal Operations Deportation Officer Noah Ellis. Specifically, Officer Ellis admits that Customs and Border Patrol (CBP) encountered the Petitioner when he entered the United States on September 16, 2023, arrested him and issued him a Notice to Appear in immigration court, and four days later (September 20, 2023) issued him with the only warrant for his arrest that has ever been issued. PageID.76-PageID-77. Officer Ellis next states admits that, on October 19, 2025, ICE ERO officers arrested the

Petitioner during “Operation Midway Blitz.” PageID.77. Notably, there is no I-200, Warrant for Arrest disclosed by Respondents other than the one that they issued at the time the Petitioner was originally conditionally paroled into the United States more than two years ago, nor do they offer any explanation as to why the Petitioner, being fully compliant with his immigration court process, suddenly needed to be arrested before the immigration court could rule on his asylum application. Further, the Petitioner appears to have been a collateral arrest on October 19, 2025, as he is not identified in the I-213 as the ERO target of the arrest. PageID.82. There has been no change whatsoever in the Petitioner’s individualized circumstances to justify taking him into custody. Respondents themselves admit that the Petitioner has no criminal history. PageID.83. Rather, the Respondents for no good cause detained him after having already released him on his own recognizance, with multiple years of good conduct and full compliance after his release.

However, the most key piece of information with regard to the I-200, Warrant of Arrest issued to and served upon the Petitioner on September 20, 2023 at 3:47 p.m. is that it specifically states, “*From evidence submitted to me, it appears that: YOHANDER JOSE LEON LOPEZ an alien who entered the United States at or near EL PASO, TEXAS on September 16, 2023 is within the country in violation of the immigration laws and is therefore liable to being taken into custody as authorized by section 236 of the Immigration and Nationality Act.*” (Emphasis added). PageID.80. Section 236 of the Immigration and Nationality Act is codified at 8 U.S.C. § 1226. In other words, the I-200 Warrant presented in evidence, in fact, demonstrates that the Petitioner is detained pursuant to 8 U.S.C. § 1226(a), and thus eligible for a bond hearing, yet due to the precedential decision of the Board of Immigration Appeals in *Matter of Yajure-Hurtado*, a bond hearing is not available to him absent an order of this Honorable Court, and thus requiring exhaustion is futile and will exacerbate the harm suffered by the Petitioner.

In a troubling repetition of a material misrepresentation that Counsel is seeing regularly on the I-213s submitted by Respondents, the I-213 falsely states as follows: “*FEAR: LEON LOPEZ asked if he was afraid of persecution or torture of returning to Venezuela which he said no.*” PageID.83. This is unequivocally false, and Counsel for the Petitioner is requesting the bodycam footage of the Petitioner’s encounter from class counsel in *Castañon-Nava*. In fact, the Petitioner submitted an asylum application detailing the severe harm that he suffered in Venezuela, resulting in his hospitalization, and explained that he is terrified to return to his home country. The Petitioner was so concerned that he requested that photos taken of him in the hospital after his severe injuries be attached to this response to the Order to Show Cause. **[Exhibit 1 – Photos of Petitioner’s Injuries/Hospitalization]**

The Respondents’ arrest of the Petitioner violated the consent decree in *Castañon Nava*, and the Petitioner’s arrest has been reported to class counsel by the undersigned Counsel for the Petitioner. Under the terms of the settlement, in the event of a violation and arrest contrary to the terms of the agreement, a class member must be released from ICE custody as soon as practicable, without paying a bond or being subject to conditions of release.

Finally, as argued in the Petitioner’s Petition for a Writ of Habeas Corpus, the Government has adopted a novel interpretation of the Immigration and Nationality Act in order to reclassify vast numbers of non-citizens, including the Petitioner, as “arriving aliens” in an unlawful attempt to deprive them of their liberty under the law and subject them to indefinite, mandatory detention. *See Matter of Yajure Hurtado*, 29 I &N Dec. 216, 229 (BIA 2025). The vast majority of federal district courts throughout the United States considering this question of law have repudiated the Respondents’ position. *See, e.g., Gomes v. Hyde*, 2025 WL 1869299 (D. Mass. July 7, 2025); *Martinez v. Hyde*, 2025 WL 2084238 (D. Mass. July 24, 2025); *Dos Santos v. Noem*, 2025 WL

2370988 (D. Mass. Aug. 14, 2025); *Romero v. Hyde*, 2025 WL 2403827 (D. Mass. Aug. 19, 2025); *Diaz Diaz v. Mattivelo*, 2025 WL 2457610 (D. Mass. Aug. 27, 2025); *Doe v. Moniz*, 2025 WL 2576819 (D. Mass. Sept. 5, 2025); *Encarnacion v. Moniz*, No. 25-12237 (D. Mass. Sept. 5, 2025); *Sampiao v. Hyde*, 2025 WL 2607924 (D. Mass. Sept. 9, 2025); *Hilario Rodriguez v. Moniz*, No. 25-12358 (D. Mass. Sept. 18, 2025); *Romero-Nolasco v. McDonald*, 2025 WL 2778036 (D. Mass. Sept. 29, 2025); *Inlago Tocagon v. Moniz*, 2025 WL 2778023 (D. Mass. Sept. 29, 2025); *Rocha v. Hyde*, 2025 WL 2807692 (D. Mass. Oct. 2, 2025); *Guerrero Orellana v. Moniz*, 2025 WL 2809996 (D. Mass. Oct. 3, 2025); *Elias Escobar v. Hyde*, 2025 WL 2823324 (D. Mass. Oct. 3, 2025); *Lema Zamora v. Noem*, 2025 WL 2958879 (D. Mass. Oct. 17, 2025); *Da Silva v. Bondi*, 2025 WL 2969163 (Oct. 21, 2025, D. Mass); *Cortez Rivera v. Hyde*, 2025 WL 2977900 (D. Mass. Oct. 22, 2025); *Moreira Aguiar v. Moniz*, 2025 WL 2987656 (D. Mass. Oct. 22, 2025); *Chogllo Chafla v. Scott*, 2025 WL 2688541 (D. Me. Sept. 2, 2025); *Chang Barrios v. Shepley*, 2025 WL 2772579 (D. Me. Sept. 29, 2025); *Chiliquinga Yumbillo v. Stamper*, 2025 WL 2783642 (D. Me. Sept. 30, 2025); *Perez Pina v. Stamper*, 2025 WL 2939298 (D. Me. Oct. 16, 2025); *Aguilar Guerra v. Joyce*, 2025 WL 2986316 (D. Me. Oct. 24, 2025); *Cesario Souza v. Hyde*, 2025 WL 2997670 (D. Mass. Oct. 24, 2025); *Chanaguano Caiza v. Scott*, 2025 WL 3013081 (D. Me. Oct. 28, 2025); *Jimenez v. FCI Berlin, Warden*, 2025 WL 2639390 (D.N.H. Sept. 8, 2025); *da Silva v. ICE*, 2025 WL 2778083 (D.N.H. Sept. 29, 2025); *Loja Lema v. FCI Berlin, Warden*, 2025 WL 3079160 (D.N.H. Nov. 4, 2025); *Ayala Casun v. Hyde*, 2025 WL 2806769 (D.R.I. Oct. 2, 2025); *Tomas Elias v. Hyde*, 2025 WL 3004437 (D.R.I. Oct. 27, 2025); *Lopez Benitez v. Francis*, 2025 WL 2371588 (S.D.N.Y. Aug. 13, 2025); *Samb v. Joyce*, 2025 WL 2398831 (S.D.N.Y. Aug. 19, 2025); *Savane v. Francis*, 2025 WL 2774452 (S.D.N.Y. Sept. 28, 2025); *Caraballo Gonzalez v. Joyce*, 2025 WL 2961626 (S.D.N.Y. Oct. 19, 2025); *J.G.O. v. Francis*, 2025 WL 3040142 (S.D.N.Y. Oct. 28,

2025); *Tumba Huamani v. Francis*, 2025 WL 3079014 (S.D.N.Y. Nov. 4, 2025); *J.U. v. Maldonado*, 2025 WL 2772765 (E.D.N.Y. Sept. 29, 2025); *Artiga v. Genalo*, 2025 WL 2829434 (E.D.N.Y. Oct. 5, 2025); *Alvarez Ortiz v. Freden*, 2025 WL 3085032 (W.D.N.Y. Nov. 4, 2025); *Rivera Zumba v. Bondi*, 2025 WL 2753496 (D.N.J. Sept. 26, 2025); *Mugliza Castillo v. Lyons*, 2025 WL 2940990 (D. N.J. October 10, 2025); *Macancela Buestan v. Chu*, 2025 WL 2972252 (D.N.J. Oct. 21, 2025); *Bethancourt Soto v. Soto*, 2025 WL 2976572 (D.N.J. Oct. 22, 2025); *de Fatima Lomeu v. Soto*, 2025 WL 2981296 (D.N.J. Oct. 23, 2025); *Lopez Lopez v. Soto*, 2025 WL 2987485 (D.N.J. Oct. 23, 2025); *Contreras Maldonado v. Cabezas*, 2025 WL 2985256 (D.N.J. Oct. 23); *Patel v. Almodovar*, 2025 WL 3012323 (D.N.J. Oct. 28, 2025); *Ayala Amaya v. Bondi*, 2025 WL 3033880 (D.N.J. Oct. 30, 2025); *Del Cid v. Bondi*, 2025 WL 2985150 (W.D. Pa. Oct. 23, 2025); *Leal-Hernandez v. Noem*, 2025 WL 2430025 (D. Md. Aug. 24, 2025); *Maldonado de Leon v. Baker*, 2025 WL 2968042 (D. Md. Oct 21, 2025); *Pineda Velasquez v. Noem*, 2025 WL 3003684 (D. Md. Oct. 27, 2025); *Hasan v. Crawford*, 2025 WL 2682255 (E.D. Va. Sept. 19, 2025); *Luna Quispe v. Crawford*, 2025 WL 2783799 (E.D. Va. Sept. 29, 2025); *Quispe-Ardiles v. Noem*, 2025 WL 2783800 (E.D. Va. Sept. 30, 2025); *Singh v. Lyons*, 2025 WL 2932635 (E.D. Va. Oct. 14, 2025); *Teyim v. Perry*, 2025 WL 2950183 (E.D. Va. Oct. 15, 2025); *Hernandez Hernandez v. Crawford*, 2025 WL 2940702 (E.D. Va. Oct. 16, 2025); *Flores Pineda v. Simon*, 2025 WL 2980729 (E.D. Va. Oct. 21, 2025); *Yobani v. Noem*, 2025 WL 2997507 (E.D. Va. Oct. 24, 2025); *Duarte Escobar v. Perry*, 2025 WL 3006742 (E.D. Va. Oct. 27, 2025); *Aguilar Lares v. Bondi* (E.D. Va. Oct. 29, 2025); *Boquin Oliva v. Noem* (E.D. Va. Oct. 29, 2025); *Sarmiento v. Perry*, 2025 WL 3091140 (E.D. Va. Nov. 5, 2025); *Diaz Garcia v. Noem*, (E.D. Va. Nov. 6, 2025); *S.D.B.B. v. Johnson*, 2025 WL 2845170 (M.D.N.C. Oct. 7, 2025); *Kostak v. Trump*, 2025 WL 2472136 (W.D. La. Aug. 27, 2025); *Lopez Santos v. Noem*, 2025 WL 2642278 (W.D. La. Sept.

11, 2025); *Ventura Martinez v. Trump*, (W.D. La. Oct. 22, 2025); *Pineda Parada v. Rice*, (W.D. La. Nov. 4, 2025); *Lopez-Arevelo v. Ripa*, 2025 WL 2691828 (W.D. Tex. Sept. 22, 2025); *Gonzalez Martinez v. Noem*, 2025 WL 2965859 (W.D. Tex. Oct. 21, 2025); *Buenrostro Mendez v. Bondi*, 2025 WL 2886346 (S.D. Tex. Oct. 7, 2025); *Padron Covarrubias v. Vergara*, 2025 WL 2950097 (S.D. Tex. Oct. 8, 2025); *Godinez-Lopez v. Ladwig*, 2025 WL 3047889 (W.D. Tenn. Oct. 31, 2025); *Beltran Barrera v. Tindall*, 2025 WL 2690565 (W.D. Ky. Sept. 19, 2025); *Singh v. Lewis*, 2025 WL 2699219 (W.D. Ky. Sept. 22, 2025); *Sanchez Ballestros v. Noem*, 2025 WL 2880831 (W.D. Ky. Oct. 9, 2025); *Gomez Mejia v. Woosley*, 2025 WL 2933852 (W.D. Ky. Oct. 15, 2025); *Contreras Orellana v. Noem*, 2025 WL 3006763 (W.D. Ky. Oct. 27, 2025); *Martinez-Elvir v. Olson*, 2025 WL 3006772 (W.D. Ky. Oct. 27, 2025); *Hernandez-Alonso v. Tindall*, 2025 WL 3083920 (W.D. Ky. Nov. 4, 2025); *Lopez-Campos v. Raycraft*, 2025 WL 2496379 (E.D. Mich. Aug. 29, 2025); *Pizarro Reyes v. Raycraft*, 2025 WL 2609425 (E.D. Mich. Sept. 9, 2025); *Contreras-Cervantes, et al., v. Raycraft*, 2025 WL 952796 (E.D. Mich. Oct. 17, 2025); *Pacheco Mayen v. Raycraft*, 2025 WL 2978529 (E.D. Mich. Oct. 17, 2025); *Diaz Sandoval v. Raycraft*, 2025 WL 2977517 (E.D. Mich. Oct. 17, 2025); *Casio-Mejia*, 2025 WL 2976737 (E.D. Mich. Oct. 21, 2025); *Santos Franco v. Raycraft*, 2025 WL 2977118 (E.D. Mich. Oct. 21, 2025); *Contreras-Lomeli v. Raycraft*, 2025 WL 2976739 (E.D. Mich. Oct. 21); *Gimenez Gonzalez v. Raycraft*, 2025 WL 3006185, at *1 (E.D. Mich. Oct. 27, 2025); *Sanchez Alvarez v. Noem*, 2025 WL 2942648 (W.D. Mich. Oct. 17, 2025); *Rodriguez Carmona v. Noem*, 2025 WL 2992222 (W.D. Mich. Oct. 24, 2025); *Puerto-Hernandez v. Lynch*, 2025 WL 3012033 (W.D. Mich. Oct. 28, 2025); *Cervantes Rodriguez v. Noem*, 2025 WL 3022212 (W.D. Mich. Oct. 29, 2025); *Marin Garcia v. Noem*, 2025 WL 3017200 (W.D. Mich. Oct. 29, 2025); *Morales Chavez v. Director*, 2025 WL 2959617 (N.D. Ohio Oct. 20, 2025) (report and recommendation); *Ochoa Ochoa v. Noem*, No. 25 CV 10865, 2025

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Neb. Aug. 14, 2025); *Anicasio v. Kramer*, 2025 WL 2374224 (D. Neb. Aug. 14, 2025); *Jacinto v. Trump*, 2025 WL 2402271 (D. Neb. Aug. 19, 2025); *Carmona-Lorenzo v. Trump*, 2025 WL 2531521 (D. Neb. Sept. 3, 2025); *Cortes Fernandez v. Lyons*, 2025 WL 2531539 (D. Neb. Sept. 3, 2025); *Palma Perez v. Berg*, 2025 WL 2531566 (D. Neb. Sept 3, 2025); *Lorenzo Perez v. Kramer*, 2025 WL 2624387 (D. Neb. Sept. 11, 2025); *Ozuna Carlon v. Kramer*, 2025 WL 2624386 (D. Neb. Sept. 11, 2025); *Genchi Palma v. Trump*, 2025 WL 2624385 (D. Neb. Sept. 11, 2025); *Duenas Arce v. Trump*, 2025 WL 2675934 (D. Neb. Sept. 18, 2025); *Rosado v. Figueroa*, 2025 WL 2337099 (D. Ariz. Aug. 11, 2025); *Echevarria v. Bondi*, 2025 WL 2821282 (D. Ariz. Oct. 3, 2025); *Benitez-Cornejo v. Cantu*, 2025 WL 2992211 (N. Ariz. Oct. 17, 2025); *Arrazola-Gonzalez v. Noem*, 2025 WL 2379285 (C.D. Cal. Aug. 15, 2025); *Zaragoza Mosqueda et al. v. Noem*, 2025 WL 2591530 (C.D. Cal. Sept. 8, 2025); *Gomez Garcia v. Noem*, 2025 WL 2986672 (C.D. Cal. Oct. 22, 2025); *Ruiz Yarleque v. Noem*, 2025 WL 3043936 (C.D. Cal. Oct. 31, 2025); *Cuevas Guzman v. Andrews*, 2025 WL 2617256 (E.D. Cal. Sept. 9, 2025); *Guerrero Lepe v. Andrews*, 2025 WL 2716910 (E.D. Cal. Sept. 23, 2025); *Ortiz Donis v. Chestnut*, 2025 WL 2879514 (E.D. Cal. Oct. 9, 2025); *J.S.H.M. v. Wofford*, 2025 WL 2938808 (E.D. Cal. Oct. 16, 2025); *Sabi Polo v. Chestnut*, 2025 WL 2959346 (E.D. Cal. Oct. 17, 2025); *Menjivar Sanchez v. Wofford*, 2025 WL 2959274 (C.D. Cal. Oct. 17, 2025); *J.A.E.M. v. Wofford*, 2025 WL 3013377 (E.D. Cal. Oct. 27, 2025); *J.A.C.P. v. Wofford*, 2025 WL 3013328 (E.D. Cal. Oct. 27, 2025); *Hernandez Nieves v. Kaiser*, 2025 WL 2533110 (N.D. Cal. Sept. 3, 2025); *Caicedo Hinstroza v. Kaiser*, 2025 WL 2606983 (N.D. Cal. Sept. 9, 2025); *Salcedo Aceros v. Kaiser*, 2025 WL 2637503 (N.D. Cal. Sept. 12, 2025); *Pablo Sequen v. Kaiser*, 2025 WL 2650637 (N.D. Cal. Sept. 16, 2025); subsequent decision 2025 WL 2935630 (N.D. Cal. Oct. 15, 2025); *Castellanos v. Kaiser*, 2025 WL 2689853 (N.D. Cal. Sept. 18, 2025); *Oliveros v. Kaiser*, 2025 WL 2677125 (N.D. Cal. Sept. 18, 2025); *Roa*

v. Albarran, 2025 WL 2732923 (N.D. Cal. Sept. 25, 2025); *Valencia Zapata v. Kaiser*, 2025 WL 2741654 (N.D. Cal. Sept. 26, 2025); *Cordero Pelico v. Kaiser*, 2025 WL 2822876 (N.D. Cal. Oct. 3, 2025); *Alvarez Chavez v. Kaiser*, 2025 WL 2909526 (N.D. Cal.); *Vasquez Garcia v. Noem*, 2025 WL 2549431 (S.D. Cal. Sept. 3, 2025); *Valdovinos v. Noem*, No. 3:25-cv-2439 (S.D. Cal. Sept. 17, 2025); *Martinez Lopez v. Noem*, 2025 WL 3030457 (S.D. Cal. Oct. 30, 2025); *Esquivel-Ipina v. Larose*, 2025 WL 2998361 (S.D. Cal. Oct. 24, 2025); *Castellanos Lopez v. Warden, Otay Mesa Det. Ctr.*, 2025 WL 3005346 (S.D. Cal. Oct. 27, 2025); *Perez-Gonzalez v. LaRose*, (S.D. Cal. Oct. 30, 2025); *Beltran v. Noem*, 2025 WL 3078837 (S.D. Cal. Nov. 4, 2025); *Garcia Magadan v. Noem*, 2025 WL 3090089 (S.D. Cal. Nov. 5, 2025); *Rico-Tapia v. Smith*, 2025 WL 2950089 (D. Haw. Oct. 10, 2025); *Maldonado Vazquez v. Feeley*, 2025 WL 2676082 (D. Nev. Sept. 17, 2025); *Sanchez Roman v. Noem*, 2025 WL 2710211 (D. Nev. Sept. 23, 2025); *Carlos v. Noem*, 2025 WL 2896156 (D. Nev. Oct. 10, 2025) (TRO); 2025 WL 2998184 (D. Nev. Oct. 24, 2025) (PI); *E.C. v. Noem*, 2025 WL 2916264 (D. Nev.); *Sanchez Aparicio v. Noem*, 2025 WL 2998098 (D. Nev. Oct. 23, 2025); *Dominguez-Lara v. Noem*, 2025 WL 2998094 (D. Nev. Oct. 24, 2025); *Bautista-Avalos v. Bernacke*, 2025 WL 3014023 (D. Nev. Oct. 27, 2025); *Arce-Cervera v. Noem*, 2025 WL 3017866 (D. Nev. Oct. 28, 2025); *L.A.E. v. Wamsley*, 2025 WL 3037856 (D. Or. Oct. 30, 2025); *Rodriguez Vazquez v. Bostock*, 779 F.Supp.3d 1239 (W.D. Wash. 2025); *Rodriguez Vazquez v. Bostock*, 2025 WL 2782499 (W.D. Wash. Sept. 30, 2025); *Guzman Alfaro v. Wamsley*, 2025 WL 2822113 (W.D. Wash. Oct. 2, 2025); *Ledesma Gonzalez v. Bostock*, 2025 WL 2841574 (W.D. Wash. Oct. 7, 2025); *Mena Torres v. Wamsley*, 2025 WL 2855379 (W.D. Wash. Oct. 8, 2025); *Ortiz Martinez v. Wamsley*, 2025 WL 2899116 (W.D. Wash. Oct. 10, 2025); *Garcia Cortes v. Noem*, 2025 WL 2652880 (D. Colo. Sept. 16, 2025); *Mendoza Gutierrez v. Baltasar*, 2025 WL 2962908 (D. Colo. Oct. 17, 2025); *Moya Pineda v. Baltasar*, No. 1:25-cv-2966 (D. Colo. Oct. 20,

2025); *Loa Caballero v. Baltazar*, 2025 WL 2977650 (D. Colo. Oct. 22, 2025); *Hernandez Vazquez v. Baltazar*, 1:25-cv-3049 (D. Colo. Oct. 23, 2025); *Nava Hernandez v. Baltazar*, 2025 WL 2996643 (D. Colo. Oct. 24, 2025); *Salazar v. Dedos*, 2025 WL 2676729 (D.N.M. Sept. 17, 2025); *Gamez Lira v. Noem*, 2025 WL 2581710 (D.N.M. Sept. 24, 2025); *Garcia Domingo v. Castro*, 2025 WL 2941217 (D.N.M. Oct. 15, 2025); *Hernandez Lopez v. Hardin*, 2025 WL 2732717 (M.D. Fla. Sept. 25, 2025); *Hinojosa Garcia v. Noem*, 2025 WL 3041895 (M.D. Fla. Oct. 31, 2025); *Aguilar Merino v. Ripa*, 2025 WL 2941609 (S.D. Fla. Oct. 15, 2025); *Alvarez Puga v. Assistant Field Office Director*, 2025 WL 2938369 (S.D. Fla. Oct. 15, 2025); *J.A.M. v. Streeval*, 2025 WL 3050094 (M.D. Ga. Nov. 1, 2025); *E.L.C. et al. v. Warden* (Nov. 4, 2025); *Rojano Gonzalez v. Sterling*, 1:25-cv-6080 (N.D. Ga. Nov. 3, 2025); *Ortega Jimenez v. Warden FCI Atlanta*, (N.D. Ga. Nov. 6, 2025); *Aguirre Villa v. Normand*, 2025 WL 3095969 (S.D. Ga. Nov. 4, 2025) (R&R); and *Aguirre Villa v. Normand*, 2025 WL 3096116 (S.D. Ga. Nov. 5, 2025).

On the basis of the foregoing, the Petitioner respectfully requests that this Honorable Court issue a Writ of Habeas Corpus ordering Respondents to release Petitioner from custody immediately, or, in the alternative, to promptly provide him with a bond hearing before an immigration judge within three (3) days.

Dated: November 20, 2025

Respectfully submitted,

s/ Amy Maldonado
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