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5 Attorney for petitioner

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7 UNITED STATES DISTRICT COURT  
8 Southern District of California

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10 JESUS HERRERA SANCHEZ,  
11 Petitioner,  
12 v.

13 CHRISTOPHER J. LaROSE ; *et al.*,  
14 Respondents.

) Case Number: 25-cv-3035-JO-SBC  
)  
) **DECLARATION OF WILLIAM**  
) **BAKER IN SUPPORT OF PETITION**  
) **FOR WRIT OF HABEAS CORPUS**

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**DECLARATION OF WILLIAM BAKER**

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I, WILLIAM BAKER, declare:

1. I am the attorney for petitioner Jesus Herrera Sanchez. This declaration is submitted in response to the court’s November 12, 2025 order to supplement the factual record re the pending habeas corpus petition. I obtained this information from the Immigration Court Electronic Record of Proceedings (eROP) and petitioner’s applications for relief.

2. Petitioner began living in the United States on a date he does not remember in May 2011. On April 7, 2017, the DHS sent petitioner back to Mexico with a voluntary departure. He returned to the USA a few weeks later in 2017. He does not remember the exact date. He has had no departures since 2017.

3. Petitioner married Jennifer Herrera, a United States citizen, on [REDACTED] 2023. They have four children: (1) [REDACTED] age 14; (2) [REDACTED] age 11; (3) [REDACTED] age 3; and (4) [REDACTED] age 4 months. [REDACTED] are stepchildren. All of the children were born in the United States. Jesus works in construction. He has a March 15, 2017 conviction (as an infraction) for disturbing the peace (California Penal Code § 415). The eROP reveals there were actually three removal cases. The procedural history of the bond and removal cases is a bit tortuous. Here is a summary of the major events.

4. On March 16, 2017, the DHS detained petitioner and filed a Notice to Appear at the Otay Mesa Immigration Court. The judge set a bond of \$5,000. In April 2017, petitioner accepted a voluntary departure and was sent to Mexico. Petitioner returned to the USA a few weeks later because he was afraid of being harmed in Mexico. The 2017 case is a paper case.

5. On June 21, 2023, the DHS detained Petitioner and filed a NTA at the Otay Mesa Immigration Court. On July 13, 2023, the judge ordered respondent released from custody under bond of \$3,000. On July 28, 2023, the DHS filed a Form I-830E informing the court petitioner was released from custody on the IJ bond of \$3,000. Venue was change to the San Diego court. On September 15, 2023, the DHS attorney moved to terminate the removal case. The judge granted the motion and terminated the removal case without prejudice.

6. On September 21, 2023, the DHS served and filed another Notice to Appear (NTA)

1 for a new removal hearing at the San Diego Immigration Court. The DHS did not detain petitioner  
2 for the final removal hearing. It is unclear what happened to the \$3,000 bond in the prior case.  
3 Petitioner filed applications for cancellation of removal and withholding of removal. On June 11,  
4 2024, the judge denied the applications and ordered removal to Mexico. On June 28, 2024,  
5 petitioner appealed this decision to the Board of Immigration Appeals. The appeal is still pending.

6 7. Petitioner says that on October 23, 2025, he was detained by unknown people in  
7 unmarked vehicles who boxed him in while he was driving on the freeway. The men detained  
8 petitioner without explanation and sent him to the Otay Mesa Detention Center.

9 8. On October 24, 2025, petitioner filed a motion for a custody redetermination hearing.  
10 On October 31, 2025, the immigration judge denied the bond request, concluding he has no  
11 jurisdiction to redetermine bond per *Matter of Yajure Hurtado*.

12 I declare under penalty of perjury under the laws of the United States that the foregoing is  
13 true and correct. Executed on November 13, 2025 at Chula Vista, California.

14 /s/ William Baker  
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16 William Baker (157 906)  
17 Attorney for petitioner  
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