

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Miguel Angel Ocegueda  
Gonzalez,**

Petitioners/Plaintiff, v.

**KRISTI NOEM**, in their official  
capacity as Secretary of the United States  
Department of Homeland Security;

**PAMELA BONDI**, in their official  
capacity as Attorney General of the  
United States;

**GARRET RIPA**, in their official  
capacity as, Director of Miami Field  
Office, U.S. Immigration and Customs  
Enforcement;

**TODD LYONS**, in their official capacity  
as Acting Director of Immigration and  
Customs Enforcement

**JUAN AGUDELO**, Acting Assistant  
Field Office Director and Office-in-  
Charge, U.S. Immigration and Customs  
Enforcement, Broward Transitional  
Center, Pompano Beach, Florida;

**SIRCE OWEN**, Acting Director of  
EOIR, in their official capacity;  
Executive Office for Immigration  
Review

Respondents-Defendants.

**Civil Action NO. 0:25-cv-62261- DMM**

---

**PETITIONER’S MEMORANDUM IN SUPPORT OF HABEAS RELIEF  
PURSUANT TO 28 U.S.C. § 2243.**

Petitioner, through undersigned counsel, respectfully submits this memorandum in support of the Court’s prompt adjudication of the pending Petition for Writ of Habeas Corpus.

On November 20, 2025, the federal district court for the Central District of California, granted a partial summary judgment rejecting Matter of Yajure Hurtado and the predecessor ICE policy applying 235(b)(2)(A) detention without bond to all persons who entered without admission/inspection. (See **Exhibit B**, Summary Judgement). On November 25, 2025, the same court issued a class certification. (See **Exhibit A**, attached order of the class certification).

The declaratory judgment in favor of the certified class to which Petitioner indisputably belongs, finding that the detention of class members under the challenged statutory and regulatory framework is unlawful. That judgment conclusively establishes that Petitioner’s ongoing detention violates federal law.

Accordingly, and pursuant to 28 U.S.C. § 2243, Petitioner respectfully requests that this Court grant the writ forthwith, as Petitioner is a class member whose detention has now been judicially declared unlawful.

Respectfully submitted this 26<sup>th</sup> day of November 2025.

/s/ Juliana G. Lamardo, Esq.

Florida Bar No. 50995  
Law Offices of Juliana G. Lamardo, P.A.  
2414 SW 22<sup>nd</sup> Street, 2<sup>nd</sup> Floor  
Miami, Florida 33145  
(305) 444-0099  
[JLamardo@LamardoLaw.com](mailto:JLamardo@LamardoLaw.com)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November 26, 2025, I electronically filed the foregoing with the Clerk of Courts using the CM/ECF. I further certify that the foregoing was served on all counsel of record via CM/ECF.

/s/ Juliana G. Lamardo, Esq.

Florida Bar No. 50995  
Law Offices of Juliana G. Lamardo, P.A.  
2414 SW 22<sup>nd</sup> Street, 2<sup>nd</sup> Floor  
Miami, Florida 33145  
(305) 444-0099  
[JLamardo@LamardoLaw.com](mailto:JLamardo@LamardoLaw.com)