

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Alexis Conde Bautista)	
)	
Petitioner,)	
)	
v.)	
)	Cause No. 4:25-cv-5433
)	
Kristi Noem et al.)	
)	
Respondents.)	

PETITIONER’S RESPONSE TO COURT’S ORDER

Petitioner by and through counsel files this Response to the Order by this Court requesting additional information (*Dkt. 13*) and states the following:

- 1) Petitioner entered the United States without inspection in August of 2014
- 2) Petitioner has continuously resided in the United States since his last entry, which is over eleven years.
- 3) Petitioner has no prior criminal history.
- 4) Petitioner was detained by Galveston County Sheriffs on his way to work at his landscaping job and turned over to ICE. No charges were filed or criminal conduct was alleged.
- 5) Petitioner has requested bond and it was denied by the Immigration Court

citing lack of jurisdiction under Matter of Hurtado. (*Ex 1- Bond Denial*)

- 6) Petitioner restates prior arguments filed in original petition (*Dkt. 1*) and Petitioner's Response (*Dkt. 12*) and moves the Court to grant his Petition for Writ of Habeas Corpus.

/s/Javier Rivera

Javier Rivera, Esq.
Lead Counsel for Petitioner
Texas Bar No. 24070508
Rivera & Shirhatti, PC
PO Box 848
Houston, Texas 77001
jrivera@rsimmilaw.com
(P): (832) 991-1105

CERTIFICATE OF SERVICE

I certify that on January 5, 2026, the foregoing document was filed with the Court through the Court CM/ECF system on all parties and counsel registered with the Court CM/ECF.

Dated this 5th day of January 2026.

/s/ Javier Rivera

Javier Rivera