UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

JOSE JAVIER HIDALGO NUNEZ,

Petitioner,

v.

Case No.

HERIBERTO TELLEZ, Warden of Jackson Parish Correctional Center; BRIAN ACUNA, Acting Field Office Director, New Orleans Immigration and Customs Enforcement; KRISTI NOEM, Secretary, of Homeland Security; U.S. Department; PAM BONDI, U.S. Attorney General, U.S. Department of Justice,

Hon. Judge:

Respondents.
_____/

PETITION FOR
WRIT OF HABEAS CORPUS

Petitioner, Jose Javier Hidalgo Nunez (Nunez), through counsel files this Petition for Writ of Habeas Corpus and respectfully requests that this Court issue a Writ of Habeas Corpus. In support, the Petitioner states:

I. INTRODUCTION

1. The Petitioner, by and through undersigned counsel, hereby files this Petition for a Writ of Habeas Corpus in order to secure his release from unlawful detention.

2. The Respondents detained Nunez on or about September 15, 2025 while he was attending an ICE check-in in Syracuse, New York. He was then transferred to the Jackson Parish Correctional Facility in Jonesboro, Louisiana.

3. Consistent with a new DHS policy issued on July 8, 2025, instructing all Immigration and Customs Enforcement (ICE) employees to consider anyone inadmissible under § 1182(a)(6)(A)(i)—i.e., those who entered the United States without admission or inspection—to be subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A) and therefore ineligible for a bond reconsideration before an immigration judge. The policy applies regardless of when a person is apprehended and affects those who have resided in the United States for months, years, and even decades. The challenged policy subjects millions of noncitizens to mandatory prolonged detention without the opportunity for release on bond, no matter how long they have resided within the country. "Immigration Appeals Court

Expands Mandatory Detention for Millions, Politico" (Sept 5, 2025 at 8:44 p.m. ET), Josh Gerstein & Kyle Cheney, https://www.politico.com/news/2025/09/05/immigration-mandatory-detention-00548660

4. Similarly, on September 5, 2025, the Board of Immigration Appeals (BIA or Board) issued a precedent decision, binding on all immigration judges, holding that an immigration judge has no authority to consider bond requests for any person who entered the United States without admission. See *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025). The Board determined that such individuals are subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A) and, therefore, ineligible to be released on bond by an immigration judge.

5. Petitioner's detention on this basis violates the plain language of the Immigration and Nationality Act of 1952 (INA). INA § 1225(b)(2)(A) does not apply to individuals like Petitioner who previously entered and have now been residing in the United States for over decades. Instead, such individuals are subject to a different statute, INA § 1226(a), that allows for review by an immigration judge who can decide whether to release on conditional parole or bond. That statute expressly applies to people who, like Petitioner, are charged as inadmissible for having entered the United States without admitted or paroled.

6. Nunez is not challenging the execution of a removal order before this Court. He is challenging his unconstitutional detention under 8 U.S.C. §1225(b).

7. The Respondents' actions are not only contrary to law and unconstitutional but have also inflicted extreme emotional distress on family.

8. Respondents' new legal interpretation is plainly contrary to the statutory framework and contrary to decades of agency practice applying § 1226(a) to people like Petitioner.

9. Accordingly, Petitioner seeks a writ of habeas corpus requiring that he be released within three days. In the interim, Petitioner asks this Court to order the Respondents not to transfer or remove him from the jurisdiction of this Court.

II. JURISDICTION

10. This Court has habeas corpus jurisdiction pursuant to28 U.S.C. §2241 et seq., 28 U.S.C. §220, 28 U.S.C. § 1331 (federal question), 28 U.S.C. § 1346 (original jurisdiction), Art. I § 9, cl. 2 of the United States Constitution (Suspension Clause), 28 U.S.C. § 1343; 28 U.S.C. § 1361; and 5 U.S.C. § 702, and common law.

11. This action arises under the Fourth and Fifth Amendments of the United States Constitution and the Immigration and Nationality Act (INA).

12. Federal district courts have jurisdiction to hear habeas claims by noncitizens challenging the lawfulness or constitutionality of DHS conduct. Federal courts are not stripped of jurisdiction under 8 U.S.C. § 1252. *See* e.g., *Zadvydas v. Davis*, 533 U.S. 678, 687 (2001).

13. This Court has jurisdiction under the Suspension Clause to review the actions of the executive branch's enforcement of the immigration laws if those actions violate the Constitution by depriving Petitioner of due process or other constitutional rights. Compare Suspension Clause with 8 U.S.C. § 1252(g); see also *Reno v. Am.-Arab Anti-Discrimination Comm.*, 525 U.S. 471, 482 (1999). The Suspension Clause protects the right to the writ of habeas corpus where, as here, no adequate or effective alternative remedy exists. See *Boumediene v. Bush*, 553 U.S. 723 (2008).

III. VENUE

14. Venue lies in the Western District of Louisiana, the judicial district in which the Petitioner is detained by the Respondents.

IV. PARTIES

15. Nunez is a citizen of the Cuba. He is currently detained by Respondents. Prior to his detention, he resided in Syracuse, New York and his immigration case was before the immigration court in Bufalo, New York.

16. Respondent Heriberto Tellez is the warden of the Jackson Parish Correctional Facility in Jonesboro, Louisiana. The Petitioner is detained at this facility and is under the control of the warden, Tim Wyatt. He is being sued in his official capacity.

17. Brian Acuna is the Acting Director of the New Orleans Field Office of the Immigration and Customs Enforcement (ICE – New Orleans) He is responsible for the detention and removal of aliens within the New Orleans District. Jonesboro, Louisiana is part of the New Orleans ICE District Office. He is being sued in his official capacity.

18. Kristi Noem is the Secretary of the U.S. Department of Homeland Security (DHS). She is generally charged with enforcement of the Immigration and Nationality Act and is further authorized to delegate such powers and authority to subordinate employees of the DHS and its various divisions. 8 USC §1103(a). She is being sued in her official capacity.

19. Pam Bondi is the Attorney General of the United States. She is responsible for the enforcement of the immigration laws. She is being sued in her official capacity.

IV. FACTS

20. Nunez entered the U.S. on or about March 27, 2022 at Eagle Pass, Texas where he turned himself in to the Respondents. Upon information and belief he was detained for approximately one day and thereafter released by the Respondents.

21. On information and belief, on June 9, 2022, he filed an application for relief with the Immigration Court in Buffalo, New York.

22. The Immigration Judge denied his application for relief and Nunez filed a timely appeal on August 14, 2025 which is still pending before the Board of Immigration Appeals (BIA). (Ex.1 – BIA Appeal Receipt). Nunez cannot be removed from the U.S. during the pendency of the BIA appeal. See 8 C.F.R. §1003.6(a) (Except as provided under § 236.1 of this chapter, § 1003.19(i), and paragraph (b) of this section, the decision in any proceeding under this chapter from which an appeal to the Board may be taken shall not be executed during the time allowed for the filing of an appeal unless a waiver of the right to appeal is filed, nor shall such decision be executed while an appeal is pending or while a case is before the Board by way of certification.)

23. After the BIA appeal had been filed, on September 15, 2025, after living In the United States for approximately 3 years, and while attending an ICE – New York check in Syracuse, New York, Nunez was detained by ICE without being given proper notice or any way to challenge his detention including access to a bond hearing before an Immigration Judge.

24. Prior to this unlawful detention, Nunez had attended every ICE-New York check-in and all of his immigration court dates with his counsel.

25. He is not subject to mandatory detention. Nunez is not a threat to public safety and is not a flight risk. He is not inadmissible or deportable under 8 U.S. Code § 1226(c)(1) nor is he subject to detention under 1226(c)(1)(E).

26. Respondents' ongoing unlawful detention without prior notice, no showing of changed circumstances or an opportunity to challenge his detention is a clear violation of his Due Process rights.

27. Without relief from this court, he faces the prospect of months, or even years, in immigration custody.

V. APPLICABLE LAW

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

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

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

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

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

33. The detention provisions at § 1226(a) and § 1225(b)(2) were enacted as part of the Illegal Immigration Reform and Immigrant Responsibility Act (IIRIRA) of 1996, Pub. L. No. 104—208, Div. C, §§ 302–03, 110 Stat. 3009-546, 3009–582 to 3009–583, 3009–585.

34. Section 1226(a) was most recently amended earlier this year by the Laken Riley Act, Pub. L. No.119-1, 139 Stat. 3 (2025). The Laken Riley Act created additional exceptions to § 1226 and authorized mandatory detention for certain categories of noncitizens under § 1226(c). See Pub. L. No. 119-1, 139 Stat. 3 (2025); 8 U.S.C. § 1226(c). Specifically, § 1226(c)(1)(E) (enacted by the Laken Riley Act) requires mandatory detention for people who were charged as being (1) inadmissible under § 1182(a)(6)(A)(i) (the inadmissibility ground for entry without inspection) or (a)(7) (the inadmissibility ground for lacking valid documentation to enter the U.S.) and who (2) have been arrested, charged with, or convicted of certain crimes not relevant here. 8 U.S.C. § 1226(c)(1)(E). The Laken Riley amendments otherwise continued to authorize discretionary detention of noncitizens charged with being inadmissible who do not fall into those enumerated exceptions.

35. 8 U.S.C. §1225(a)] Inspection.-- 235(a)(1) [1225(a)(1)] Aliens treated as applicants for admission.--An alien present in the United States who has not been admitted or who arrives in the United States (whether or not at a designated port of

arrival and including an alien who is brought to the United States after having been interdicted in international or United States waters) shall be deemed for purposes of this Act an applicant for admission. See also, *Jennings v. Rodriguez*, 583 U.S. 281, 289 (2018) (explaining that 8 U.S.C.§ 1225(b)(2)'s mandatory detention scheme applies to noncitizens "seeking admission into the United States.")

36. 8 U.S.C. §1225(b)(1) applies only to certain aliens who are inadmissible into the United States because they either lack valid entry documents or have attempted to procure their admission through fraud or misrepresentation. The statute generally permits the government to summarily remove those aliens if they are arriving in the United States. This is otherwise known as expedited removal. The statute also authorizes, but does not require, the government to apply this procedure to aliens who are inadmissible on the same grounds if they have been physically present in the country for less than two years.

37. A warrant is not required for an arrest pursuant to 8 U.S.C. §1225. This section grants immigration officers the power to detain aliens who do not appear clearly entitled to admission, allowing for their examination and detention for further inquiry without a warrant. The detention authority under 8 U.S.C. §1225 is automatic and mandatory and therefore no warrant exists for this type of detention. "An applicant for admission who is arrested and detained without a warrant while arriving in the United States, whether or not at a port of entry, and subsequently placed in removal proceedings is detained under section 235(b) of the Immigration

and Nationality Act ("INA"), 8 U.S.C. § 1225(b) (2018)" *Matter of Q-Li,* 29 I&N Dec. 66 (BIA 2025).

38. 8 U.S.C. § 1226 authorizes the detention of noncitizens in standard removal proceedings before an immigration judge. See 8 U.S.C. § 1229(a). Individuals in Section 1226(a) detention are generally entitled to a bond hearing at the outset of their detention, see 8 C.F.R. §§ 1003.19(a), 1236.1(d), while noncitizens who have been arrested, charged with, or convicted of certain crimes are subject to mandatory detention, see 8 U.S.C. § 1226(c).

39. This section requires a warrant because once the person has been in the U.S. for over two years, the government must have some probable cause to arrest that person and this must be spelled out in the warrant. See, 8 U.S.C. § 1226(a).

40. The Court has broad, equitable authority under the habeas statute, 28 USC 2241, 2243 and the common law, to dispose of Petitioner's case as law and justice require, based on the facts and circumstances of this case, in order to remedy Petitioner's unlawful detention.

41. The Court should exercise this authority to grant Petitioner's habeas corpus petition and to fashion any and all additional relief, necessary to effectuate Esperanza's expeditious release from unlawful detention. In the absence of such relief, Nunez is suffering and will continue to suffer irreparable harm.

42. The Due Process Clause provides that no person shall "be deprived of life, liberty, or property, without due process of law." U.S. Const. amend. V. In this case there has been absolutely no due process of law.

VI. EXHAUSTION OF ADMINISTRATIVE REMEDIES

43. There is no applicable statute or rule that mandates administrative exhaustion. However the court could mandate prudential exhaustion. But even if a court would ordinarily enforce prudential exhaustion, it may still choose to waive such exhaustion. For example, when the "legal question is fit for resolution and delay means hardship," a court may choose to decide the issues itself. *Shalala v. Ill. Council on Long Term Care ,Inc.*, 529 U.S. 1, 13 (2000) (citation omitted). A court may also excuse exhaustion if the "pursuit of administrative remedies would be a futile gesture." *Shearson*, 725 F.3d at 594 (citation omitted).

44. In this case, there are no administrative remedies to exhaust since the Board of Immigration Appeals (BIA) has issued a precedent decision stating that people like the Petitioner are subject to mandatory detention. See, *Matter of Yajure Hurtado,* 29 I&N Dec. 216 (BIA 2025). This decision binds all immigration judges. There is no avenue for administrative review.

45. Nunez faces substantial hardship if the Court declines to address this issue. The deprivation of liberty, by itself, constitutes a serious hardship. Courts have recognized that exhaustion requirements may be excused when an

administrative remedy operates under "an unreasonable or indefinite timeline." *McCarthy v. Madigan*, 503 U.S. 140, 147 (1992).

CAUSES OF ACTION

FIRST CLAIM FOR RELIEF
VIOLATION OF DUE PROCESS
FIFTH AMENDMENT OF THE US CONSTITUTION

46. Petitioner realleges the foregoing paragraphs as if set forth fully herein.

47. The Fifth Amendment of the Constitution guarantees that civil detainees, including all immigrant detainees, may not be subjected to punishment. The federal government also violates substantive due process when it subjects civil detainees to cruel treatment and conditions of confinement that amount to punishment.

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

49. The Supreme Court has long made clear that when the government seeks to deprive an individual of a "particularly important individual interest[]," it must bear the burden of justifying this deprivation by clear and convincing evidence. *Addington v. Texas*, 441 U.S. 418, 424 (1979). Esperanza was suddenly detained without explanation. He has a significant interest at stake, and a "clear

and convincing" evidence standard provides the appropriate level of procedural protection. *Id.* at 423.

50. To comport with substantive due process, civil immigration detention must bear a reasonable relationship with its two regulatory purposes— (1) to ensure the appearance of noncitizens at future hearings and (2) to prevent danger to the community pending the completion of removal. *Zadvydas*, 533 U.S. at 690-91.

51. The Respondents through their actions believe that they can detain Nunez without affording him due process. His detention has no reasonable relationship to the regulatory purposes of civil detention.

SECOND CLAIM FOR RELIEF
VIOLATION OF FOURTH AMENDMENT

52. Petitioner realleges the foregoing paragraphs as if set forth fully herein.

53. The Fourth Amendment protection against "unreasonable searches and seizures" is a protection against "arrest without probable cause." *Terry v. Ohio*, 392 U.S. 1, 88 S.Ct. 1868, 20 L.Ed.2d 889 (1968);

54.In this case, the Respondents have detained Esperanza without probably cause and in violation of the Fourth Amendment of the U.S. Constitution.

THIRD CLAIM FOR RELIEF

VIOLATION OF THE IMMIGRATION AND NATIONALITY ACT

55. Petitioner realleges the foregoing paragraphs as if set forth fully herein.

56. 8 U.S.C.§ 1226(a) mandates that a person be provided a bond redetermination hearing before an immigration court.

57. Since Respondents adopted their new policies, dozens of federal courts have rejected their new interpretation of the INA's detention authorities. Courts have likewise rejected *Matter of Yajure Hurtado*, which adopts the same reading of the statute as ICE.

58. Even before ICE and the BIA introduced these nationwide policies, IJs in the Tacoma, Washington, immigration court stopped providing bond hearings for persons who entered the United States without inspection and who have since resided here. There, the U.S. District Court in the Western District of Washington found that such a reading of the INA is likely unlawful and that § 1226(a), not § 1225(b), applies to noncitizens who are not apprehended upon arrival to the United States. *Rodriguez Vazquez v. Bostock*, 779 F. Supp. 3d 1239 (W.D. Wash. 2025).

59. Subsequently, court after court, including three in this district, has adopted the same reading of the INA's detention authorities and rejected ICE and EOIR's new interpretation. See, e.g., *Lopez Benitez v. Francis*, No. 25 CIV. 5937

(DEH), 2025 WL 2371588 (S.D.N.Y. Aug. 13, 2025); *Contreras-Cervantes v. Raycraft*, No. 25-CV-13073 (E.D. Mich. Oct. 17, 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; *Gomes v. Hyde*, No. 1:25-CV-11571-JEK, 2025 WL 1869299 (D. Mass. July 7, 2025); *Diaz Martinez v. Hyde*, No. CV 25-11613-BEM, --- F. Supp. 3d ----, 2025 WL 2084238 (D. Mass. July 24, 2025); *Rosado v. Figueroa*, No. CV 25-02157 PHX DLR (CDB), 2025 WL 2337099 (D. Ariz. Aug. 11, 2025), report and recommendation adopted, No. CV-25-02157-PHX-DLR (CDB), 2025 WL 2349133 (D. Ariz. Aug. 13, 2025); *Maldonado v. Olson*, No. 0:25-cv-03142-SRN-SGE, 2025 WL 2374411 (D. Minn. Aug. 15, 2025); *Arrazola-Gonzalez v. Noem,* No. 5:25-cv-01789-ODW (DFMx), 2025 WL 2379285 (C.D. Cal. Aug. 15, 2025); *Romero v. Hyde*, No. 25-11631-BEM, 2025 WL 2403827 (D. Mass. Aug. 19, 2025); *Samb v. Joyce*, No. 25 CIV. 6373 (DEH), 2025 WL 2398831 (S.D.N.Y. Aug. 19, 2025); *Ramirez Clavijo v. Kaiser*, No. 25-CV-06248-BLF, 2025 WL 2419263 (N.D. Cal. Aug. 21, 2025); *Leal-Hernandez v. Noem*, No. 1:25-cv-02428-JRR, 2025 WL 2430025 (D. Md. Aug. 24, 2025); *Kostak v. Trump*, No. 3:25-cv-01093-JE-KDM, 2025 WL 2472136 (W.D. La. Aug. 27, 2025); *Jose J.O.E. v. Bondi*, No. 25-CV-3051 (ECT/DJF), --- F. Supp. 3d ----, 2025 WL 2466670 (D. Minn. Aug. 27, 2025); *Vasquez Garcia v. Noem*, No. 25-cv-02180-DMS-MM, 2025 WL 2549431 (S.D. Cal. Sept. 3, 2025); *Zaragoza Mosqueda v. Noem*, No. 5:25-CV-02304 CAS (BFM), 2025 WL 2591530 (C.D.

Cal. Sept. 8, 2025); *Sampiao v. Hyde*, No. 1:25-CV-11981-JEK, 2025 WL 2607924 (D. Mass. Sept. 9, 2025); see also, e.g., *Palma Perez v. Berg*, No. 8:25CV494, 2025 WL 2531566, at *2 (D. Neb. Sept. 3, 2025) (noting that "[t]he Court tends to agree" that § 1226(a) and not § 1225(b)(2) authorizes detention); *Jacinto v. Trump*, No. 4:25-cv-03161-JFB-RCC, 2025 WL 2402271 at *3 (D. Neb. Aug. 19, 2025) (same); *Anicasio v. Kramer*, No. 4:25-cv-03158-JFB-RCC, 2025 WL 2374224 at *2 (D. Neb. Aug. 14, 2025) (same).

60. Courts have uniformly rejected DHS's and EOIR's new interpretation because it defies the INA. As the *Rodriguez Vazquez* court and others have explained, the plain text of the statutory provisions demonstrates that § 1226(a), not § 1225(b), applies to people like Petitioner.

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

62. The text of § 1226(a) also explicitly applies to people charged as being inadmissible, including those who entered without inspection. See 8 U.S.C. § 1226(c)(1)(E). Subparagraph (E)'s reference to such people makes clear that, by default, such people are afforded a bond hearing under subsection (a). As the Rodriguez Vazquez court explained, "[w]hen Congress creates 'specific exceptions' to a statute's applicability, it 'proves' that absent those exceptions, the

statute generally applies." *Rodriguez Vazquez*, 779 F. Supp. 3d at 1257 (citing *Shady Grove Orthopedic Assocs., P.A. v. Allstate Ins. Co.,* 559 U.S. 393, 400 (2010)); see also *Gomes*, 2025 WL 1869299, at *7.

63. 8 U.S.C. §1226(a), therefore, leaves no doubt that it applies to people who face charges of being inadmissible to the United States, including those who are present without admission or parole.

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

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

66. The mandatory detention provision at 8 U.S.C. § 1225(b)(2) does not apply to all noncitizens residing in the United States who are subject to the grounds of inadmissibility. As relevant here, it does not apply to those who previously entered the country and have been residing in the United States prior to being apprehended and placed in removal proceedings by Respondents. Such noncitizens

are detained under § 1226(a), unless they are subject to § 1225(b)(1), § 1226(c), or § 1231.

67. The application of § 1225(b)(2) to Petitioner mandates his continued unlawful detention and violates the INA and the U.S. Constitution.

VII. CONCLUSION

THEREFORE, the Petitioner respectfully requests that this Court:

a. Issue a Writ of Habeas Corpus on the ground that the continued detention of Nunez violates the Due Process Clause and order Nunez's immediate release;

b. Maintain the current status quo of this case so that the Respondent is not transferred out of this Court's jurisdiction;

c. Find that the Respondents have acted in bad faith in violating the U.S. Constitution and the INA;

d. Award Plaintiffs their costs and reasonable attorneys' fees in this action.

f. Any other relief the Court deems appropriate.

Respectfully submitted:
/s/ Emily C. Trostle
Emily C. Trostle (LA 36058) Dated: November 14, 2025
P.O. Box 19287
New Orleans, LA 70179
Email: emily@trostlelaw.com
Telephone: (504) 345-8310
Facsimile: (504) 534-3016
Local Counsel for Petitioner

/s/Caridad Pastor (*Pro Hac Vice* pending)
Caridad Pastor C (Mi P43551)
Pastor and Associates, P.C.
11 Broadway Suite 1005
New York, New York 10004
Email: carrie@pastorandassociates.com
Telephone: (248) 619-0065
Attorney for Petitioner

Certificate of Service

I, the undersigned, hereby certify that on this date, I will send a copy of certified U.S. mail, return receipt requested, to:

Civil Process Clerk
U.S. Attorney's Office for the Western District of Louisiana
Jackson Parish Section
United States Post Office and Court House
201 Jackson Street, Suite 215
Monroe, Louisiana 71201

Pam Bondi
Attorney General of the United States
950 Pennsylvania Avenue, NW
Washington, DC 20530

Heriberto Tellez
Warden Jackson Parish Correctional Facility
327 Industrial Drive
Jonesboro, LA 71251

Brian Acuna
Acting Field Office Director of ICE/ERO in New Orleans
1250 Poydras
Suite 325
New Orleans, LA 70113

Dated: November 14, 2025

Respectfully submitted,

/s/ Emily C. Trostle

Emily C. Trostle (LA 36058)
P.O. Box 19287
New Orleans, LA 70179
Email: emily@trostlelaw.com
Telephone: (504) 345-8310
Facsimile: (504) 534-3016

Local Counsel for Petitioner