

1 Arwa J.Z. Kakavand (CA Bar No. 310732)
2 CASA CORNELIA LAW CENTER
3 P.O. Box 12666
4 San Diego, CA 92112
5 Tel: (619) 231-7788
6 Fax: (619) 231-7784
7 azakir@casacornelia.org

8 Pro Bono Attorney for Petitioner

9 UNITED STATES DISTRICT COURT
10 SOUTHERN DISTRICT OF CALIFORNIA

11 ONORES DE JESUS MEJIA IRIARTE ,
12 Petitioner,

13 v.

14 CHRISTOPHER J. LAROSE, Senior
15 Warden, Otay Mesa Detention Center;
16 PATRICK DIVVER, Field Office
17 Director, U.S. Immigration and Customs
18 Enforcement;
19 TODD M. LYONS, Acting Director, U.S.
20 Immigration and Customs Enforcement;
21 KRISTI NOEM, Secretary of United
22 States Department of Homeland Security;
23 and
24 PAM BONDI, Attorney General of the
25 United States,

26 Respondents.

Case No.: '25CV3138 BAS AHG

**PETITION FOR WRIT OF HABEAS
CORPUS AND ORDER TO SHOW
CAUSE WITHIN THREE DAYS AND
COMPLAINT FOR INJUNCTIVE
AND DECLARATORY RELIEF**

27
28
29 Petitioner Onores De Jesus Mejia Iriarte petitions this Court for a writ of habeas
30 corpus under 28 U.S.C. § 2241 to remedy Respondents' detaining her unlawfully, and
31 states as follows:

1 INTRODUCTION

2 1. Onores De Jesus Mejia Iriarte is a fifty-year-old Honduran woman detained
3 at Otay Mesa Detention Center in San Diego, California. She submits this habeas petition
4 under 28 U.S.C. § 2241 for a judicial check on Respondents’ unlawful revocation of her
5 release on an Order of Supervision and Unsupervised Parole (“OSUP”) and detaining her
6 without belief that her removal from the United States is reasonably foreseeable.

7 2. On October 5, 2011, an immigration judge in Eloy, Arizona, ordered Mejia
8 Iriarte removed to Honduras, and U.S. Immigration and Customs Enforcement
9 effectuated her removal on October 13, 2011.

10 3. Then, on January 24, 2014, Mejia Iriarte was arrested near Sasabe, Arizona,
11 and ICE served her with a reinstated removal order. She was again removed to Honduras
12 on February 27, 2014.

13 4. And finally, on March 23, 2019, Mejia Iriarte re-entered the United States
14 near San Ysidro, California, without inspection, and was apprehended by U.S. Border
15 Patrol. Mejia Iriarte expressed a fear of return to Honduras, and the government released
16 her from custody on March 29, 2019, under an OSUP without giving her a Reasonable
17 Fear Interview.

18 5. ICE reinstated her prior removal order on January 10, 2023. Thus, her
19 removal order became final under 8 U.S.C. § 1101(a)(47)(B) in January 2023. *See Riley*
20 *v. Bond*, 606 U.S. ____ (2025).

21 6. And from that time until January 28, 2025, she dutifully reported to
22 Immigration and Customs Enforcement (ICE) under OSUPs that required her to check in
23 with ICE periodically.

24 7. But in January 2025, six years after ICE released her and issued her an
25 OSUP, without any notice—much less the process that was due—ICE officers arbitrarily
26 canceled her OSUP and took her into custody.

27 8. Mejia Iriarte again expressed fear of returning to Honduras and remained in
28 ICE custody while her withholding-only proceedings pended.

1 9. On August 25, 2025, the U.S. Department of Homeland Security notified the
2 immigration judge of its intent to designate Mexico as an alternate country of removal.

3 10. On September 30, 2025, an immigration judge at the Immigration Court in
4 Otay Mesa, California, granted Mejia Iriarte withholding of removal as to Honduras, on
5 account of the past persecution she suffered in that country because of her *per se* political
6 opinion as a victim of forced sterilization under 8 U.S.C. § 1101(a)(42). And the
7 immigration judge declined to designate Mexico as a county of removal, finding that
8 DHS’s designation was violative of Mejia Iriarte’s due process rights to notice. Both
9 parties waived the right to appeal.

10 11. ICE nonetheless sought to remove Mejia Iriarte to Mexico. They brought
11 Mejia Iriarte to the San Ysidro Port of Entry around 1:00 a.m. on October 8, 2025. But
12 Mejia Iriarte’s deportation officer, Rosendo Martinez Jr., confirmed that Ms. Mejia Iriarte
13 would be brought back to Otay Mesa Detention Center in the afternoon of October 8,
14 2025. Officer Martinez declined to elaborate as to why.

15 12. And on October 20, 2025, a U.S. Citizenship and Immigration Services
16 Asylum Officer conducted a “Third Country Screening” regarding Mejia Iriarte’s fear of
17 being repatriated to Mexico. The Asylum Officer has yet not provided counsel or Mejia
18 Iriarte the results of the screening.

19 13. ICE’s withdrawal of Mejia Iriarte’s OSUP and subsequent detention was
20 permissible only if ICE could demonstrate that removal could occur “in the reasonably
21 foreseeable future” or if she had violated release conditions—neither of which occurred
22 here. *See Zadvydas v. Davis*, 533 U.S. 678 (2001); 8 C.F.R. § 241.13(h)(4).

23 14. Under the Supreme Court’s holding in *Zadvydas*, ICE may only detain
24 individuals after the removal period if there is a “reasonable foreseeability” of removal
25 within a predictable timeframe. Here, ICE’s own actions in beginning to search for a third
26 country only after taking Petitioner into custody demonstrate the absence of any such
27 reasonable foreseeability.

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1 15. Moreover, even assuming that ICE possessed theoretical authority to revoke
2 release, the agency failed to meet mandatory procedural requirements, including the
3 obligation to establish “a significant likelihood that the [non-citizen] may be removed in
4 the reasonably foreseeable future” under 8 C.F.R. § 241.13(i)(2) and to provide her with
5 notice of the specific reasons for revocation as 8 C.F.R. § 241.13(i)(3) requires. ICE’s
6 actions were all the more egregious because they occurred well beyond the ninety-day
7 removal period established by law (*see* 8 U.S.C. § 1231(a)(1)(A)), and only after Mejia
8 Iriarte had been living lawfully in the community for six years following the post-
9 removal OSUP.

10 16. ICE’s arbitrary cancellation of Petitioner’s OSUP and subsequent detention
11 constitute flagrant violations of due process and regulatory law.

12 17. Absent review in this Court, no other neutral adjudicator will examine Mejia
13 Iriarte’s plight: Respondents will continue, unchecked, to detain her—potentially
14 indefinitely—unless or until they remove her to an as-yet-undetermined country, despite
15 *Zadvydas*’s and the regulatory requirements. She thus urges this Court to review the
16 lawfulness of her detention; declare that her detention is unlawful; and order either her
17 immediate release or that Respondents provide her a bond hearing complying with the
18 procedural requirements in *Singh v. Holder*, 638 F.3d 1196 (9th Cir. 2011).

19 **CUSTODY**

20 18. Mejia Iriarte is currently in Respondents’ legal and physical custody. They are
21 detaining her at the Otay Mesa Detention Center in San Diego, California. She is under
22 Respondents’ and their agents’ direct control.

23 **PARTIES**

24 19. Petitioner Mejia Iriarte is a citizen of Honduras. She fled that country
25 because she suffered past persecution and fears future persecution there. She arrived in
26 the United States in March 2019 and sought protection. And she was at liberty—and
27 complying with all check-in obligations—until Respondents detained her on January 28,
28

1 2025. In withholding-only proceedings, an immigration judge granted her withholding of
2 removal as to Honduras on September 30, 2025.

3 20. Mejia Iriarte is currently in Respondents' legal and physical custody at the
4 Otay Mesa Detention Center in San Diego, California. CoreCivic, Inc., a Maryland
5 corporation, operates that facility.

6 21. Respondent Christopher J. LaRose is the Senior Warden at the Otay Mesa
7 Detention Center, where Petitioner is being held. Respondent Larose is Mejia Iriarte's
8 immediate custodian. Mejia Iriarte sues him in his official capacity.

9 22. Respondent Patrick Divver is the Director of ICE's San Diego Field Office
10 for Enforcement and Removal Operations. That office determines whether Mejia Iriarte
11 will be detained in ICE custody or released. Respondent Divver has custodial authority
12 over Mejia Iriarte, who names him in his official capacity.

13 23. Respondent Todd M. Lyons is the Acting Director of ICE. ICE is a
14 component of the DHS, 6 U.S.C. § 271, and an "agency" within the meaning of the
15 Administrative Procedure Act, 5 U.S.C. § 701(b)(1). It is the agency responsible for
16 enforcing immigration laws, and it is detaining Mejia Iriarte. Respondent Lyons has
17 custodial authority over Mejia Iriarte, who names him in his official capacity.

18 24. Respondent Kristi Noem is the Secretary of the DHS. DHS is the federal
19 agency responsible for enforcing immigration laws and granting immigration benefits.
20 *See* 8 U.S.C. § 1103(a); 8 C.F.R. § 2.1. Respondent Noem has ultimate custodial
21 authority over Mejia Iriarte, who names her in her official capacity.

22 25. Respondent Pam Bondi is the Attorney General of the United States. She is
23 responsible for the Immigration and Nationality Act's implementation and enforcement
24 (*see* 8 U.S.C. §§ 1103(a)(1), (g)), and oversees the Executive Office for Immigration
25 Review, the office that entered an order granting her withholding of removal as to
26 Honduras. Mejia Iriarte names her in her official capacity.

27 **JURISDICTION AND VENUE**
28

1 26. This action arises under the United States Constitution and the Immigration
2 and Nationality Act, 8 U.S.C. § 1101 et seq., INA § 101 et seq., to challenge Mejia
3 Iriarte’s detention under the INA and any inherent or plenary powers the government
4 may claim to continue holding him.


5 27. This Court has jurisdiction under 28 U.S.C. § 1331, § 2241; 5 U.S.C. §§
6 701–706 (Administrative Procedure Act, “APA”); the Suspension Clause, U.S. Const. art.
7 I, § 9, cl. 2; and the Fifth and Eighth Amendments of the United States Constitution.
8 Jurisdiction is not limited by a petitioner’s nationality, immigration status, or any other
9 classification. *See Boumediene v. Bush*, 553 U.S. 723, 747 (2008). The Court may grant
10 relief under the Suspension Clause; the Fifth and Eighth Amendments; 5 U.S.C. § 706
11 (APA); and 28 U.S.C. §§ 1361 (Mandamus Act), 1651 (All Writs Act), 2001
12 (Declaratory Judgment Act), and 2241 (habeas corpus).

13 28. Specifically, this Court has jurisdiction under 28 U.S.C. § 2241 to review
14 Mejia Iriarte’s detention and her challenge to the government’s arbitrary cancellation of
15 her OSUP. Federal district courts possess broad authority to issue writs of habeas corpus
16 when a person is held “in custody in violation of the Constitution or laws or treaties of
17 the United States” (28 U.S.C. § 2241(c)(3)), and this authority extends to immigration
18 detention challenges that survived the REAL ID Act’s jurisdictional restrictions. Because
19 Mejia Iriarte seeks the traditional habeas remedy of release from allegedly unlawful
20 detention, her petition presents precisely the type of threshold legality-of-detention
21 question that § 2241 was designed to address. *See INS v. St. Cyr*, 533 U.S. 289, 301
22 (2001); *see also Lopez-Marroquin v. Barr*, 955 F.3d 759, 759 (9th Cir. 2020) (citing
23 *Singh*, 638 F.3d at 1211-12)). And federal courts are not stripped of jurisdiction under 8
24 U.S.C. § 1252. *See, e.g., Zadvydas v. Davis*, 533 U.S. 678, 687 (2001). No court has
25 ruled on the legality of Mejia Iriarte’s detention.

26 29. Venue is proper in this District under 28 U.S.C. §§ 1391(b)(2) and (e)(1)
27 because a substantial part of the events or omissions giving rise to this claim have
28 happened here, Mejia Iriarte is detained here, and her custodian resides here. Venue is

1 also proper under 28 U.S.C. § 2243 because Mejia Iriarte's immediate custodian resides
2 in this District. *See Rumsfeld v. Padilla*, 542 U.S. 426, 451-52 (2004) (Kennedy, J.,
3 concurring).

4 FACTUAL BACKGROUND

5 30. Mejia Iriarte is a native and citizen of Honduras, born in Tocoa Colon,
6 Honduras in  1975.

7 31. On information and belief, DHS placed Mejia Iriarte in removal proceedings
8 in October 2011.

9 32. On information and belief, on October 5, 2011, an immigration judge in
10 Eloy, Arizona, ordered Mejia Iriarte removed to Honduras, and U.S. Immigration and
11 Customs Enforcement effectuated her removal on October 13, 2011.

12 33. On information and belief, on January 24, 2014, Mejia Iriarte was arrested
13 near Sasabe, Arizona, and ICE served her with a reinstated removal order. She was again
14 removed to Honduras on February 27, 2014.

15 34. On information and belief, on March 23, 2019, Mejia Iriarte re-entered the
16 United States near San Ysidro, California, without inspection, and was apprehended by
17 U.S. Border Patrol.

18 35. On information and belief, Mejia Iriarte expressed a fear of return to
19 Honduras, and the government released her from custody on March 29, 2019, under an
20 OSUP without giving her a Reasonable Fear Interview.

21 36. On January 10, 2023, ICE reinstated her removal order. Thus, her removal
22 order became final under 8 U.S.C. § 1101(a)(47)(B) in January 2023. *See Riley v. Bond*,
23 606 U.S. ____ (2025).

24 37. Mejia Iriarte dutifully checked in with ICE under the OSUP issued on March
25 29, 2019, until ICE arrested her during her routine check-in on January 28, 2025.

26 38. On information and belief, prior to her detention, Petitioner was given no
27 notice of ICE's intention to re-detain her, and she was not provided with any information
28 about why her OSUP was presumably revoked.

1 39. On information and belief, ICE has no particularized evidence that Petitioner
2 can be removed to any third country.

3 40. On information and belief, Petitioner has not received an individualized
4 hearing before a neutral decisionmaker to assess whether her recent re-detention is
5 warranted due to danger or flight risk.

6 41. On September 30, 2025, in withholding-only proceedings, an immigration
7 judge in the Otay Mesa Immigration Court granted Mejia Iriarte withholding as to
8 Honduras. The immigration judge declined to designate Mexico as an alternate country of
9 removal because DHS did not properly provide Mejia Iriarte notice, nor did they cite any
10 statutory authority for designating Mexico an alternate country of removal in
11 withholding-only proceedings.

12 42. On October 1, 2025, counsel emailed Mejia Iriarte's deportation officer, DO
13 Martinez, requesting advanced notice of Mejia Iriarte's release and DO Martinez
14 responded that he was in communication with the DHS Office of the Principal Legal
15 Advisor about a "potential" third country request and that he would keep counsel updated
16 on the outcome.

17 43. On information and belief, on the morning of October 8, 2025, ICE
18 unsuccessfully attempted to remove Mejia Iriarte to Mexico—without notifying counsel.
19 Mejia Iriarte was re-detained at the Otay Mesa Detention Center that afternoon.

20 44. On October 8, 2025, counsel again emailed DO Martinez to follow up on the
21 status of a "potential" third country request. Counsel also made several phone calls and
22 left voicemail messages to DO Martinez for an update on Mejia Iriarte's status.

23 45. When DO Martinez did not respond to counsel's email and phone calls,
24 Mejia Iriarte's counsel emailed DO Martinez again on October 8, 2025, when upon
25 information and belief, counsel learned that ICE had removed Mejia Iriarte from the
26 detention facility without contacting counsel. Again, DO Martinez did not respond.

1 46. Then, counsel emailed the Assistant Field Office Director explaining that
2 DO Martinez had not contacted her despite emails, phone calls, and voicemail
3 messages—to discuss Mejia Iriarte’s whereabouts and ICE’s intentions.

4 47. Finally, DO Martinez returned counsel’s phone call in the afternoon of
5 October 8, 2025, notifying counsel that ICE attempted to remove Mejia Iriarte to Mexico,
6 but that, instead they brought her back to Otay Mesa Detention Center. DO Martinez
7 gave no reason for why ICE was not able to successfully remove Mejia Iriarte to Mexico.

8 48. Upon Mejia Iriarte’s return to the ICE detention center, her counsel apprised
9 DO Martinez of her representation by counsel, her fear of removal to Mexico based on
10 her nationality and membership in a particular social group, her ties to the United States
11 (including that she is married to a United States citizen), and the documented practices of
12 Mexico exposing noncitizens to conditions rising to torture.

13 49. On October 20, 2025, counsel represented Mejia Iriarte for a “Third Country
14 Screening” conducted by an USCIS Asylum Officer.

15 50. Neither counsel nor Mejia Iriarte have been notified of the results of Mejia
16 Iriarte’s “Third Country Screening.” She remains in ICE custody at Otay Mesa Detention
17 Center.

18 EXHAUSTION OF REMEDIES

19 51. Mejia Iriarte has exhausted all administrative remedies, and no further ones
20 are available.

21 LEGAL FRAMEWORK

22 52. Section 1231(a) of Title 8 governs the detention of individuals whom
23 immigration courts have ordered removed. The statute commands ICE to detain these
24 individuals for ninety days while it executes the removal order. See 8 U.S.C. §
25 1231(a)(2). The ninety-day removal period starts the moment the removal order becomes
26 final. Absent an applicable exception, ICE must release the person under supervision if it
27 cannot complete removal within ninety days. See 8 U.S.C. § 1231(a)(3).

1 53. Subsection 1231(a)(6) authorizes ICE to extend detention beyond the ninety-
2 day period, yet it bars indefinite custody. *See Zadvydas*, 533 U.S. at 689 (limiting ICE’s
3 authority to a period “reasonably necessary” to carry out removal and prohibiting
4 detention when removal is not “reasonably foreseeable”).

5 54. Regulations allow ICE to release a non-citizen after the ninety-day removal
6 period if the agency determines that the non-citizen “would not pose a danger to the
7 public or a risk of flight, without regard to the likelihood of the [non-citizen’s] removal in
8 the reasonably foreseeable future.” 8 C.F.R. § 241.13(b)(1). ICE typically places these
9 individuals on an OSUP, as it has done with Mejia Iriarte for the past six years. *See* 8
10 C.F.R. § 241.4(j); 8 C.F.R. § 241.13(h).

11 55. ICE may withdraw release approval if it can effectuate removal “in the
12 reasonably foreseeable future” or if the non-citizen violates the release conditions.
13 8 C.F.R. § 241.13(h)(4). ICE may revoke release only when “there is a significant
14 likelihood that the [non-citizen] may be removed in the reasonably foreseeable future.”
15 *Id.* § 241.13(i)(2). Upon revocation, ICE must notify the non-citizen of the reasons for the
16 revocation. *Id.* § 241.13(i)(3).

17 FIRST CAUSE OF ACTION

18 Unlawful Revocation of Release

19 56. Mejia Iriarte re-alleges and incorporates by reference, as if fully set forth
20 herein, the allegations in paragraphs 1-55 above.

21 57. Mejia Iriarte was previously detained by ICE and released because her
22 removal could not occur. If she complies with the conditions of this OSUP, Respondents
23 have the authority to revoke her release only if there is a significant likelihood that they
24 can remove her in the reasonably foreseeable future. *See* 8 C.F.R. § 241.13(i)(2).

25 58. Respondents revoked Mejia Iriarte’s release without evidence that she can
26 be removed to a third country. Indeed, at the time of her detention, ICE had not even
27 decided which country it would attempt to remove her to, let alone whether such removal
28 could be done in the reasonably foreseeable future.

1 59. Respondents' actions are arbitrary, capricious, an abuse of discretion, and
2 contrary to law. 5 U.S.C. § 706(a)(2)(A). Mejia Iriarte is entitled to immediate release on
3 an OSUP.

4 SECOND CAUSE OF ACTION

5 Violation of Procedures for Revocation of Release

6 60. Mejia Iriarte re-alleges and incorporates by reference, as if fully set forth
7 herein, the allegations in paragraphs 1-55 above.

8 61. The governing regulations require Respondents to notify Mejia Iriarte of the
9 reason for her re-detention. 8 C.F.R. § 241.13(i)(3). Respondents have not complied with
10 this obligation, nor have they yet provided her with an initial interview at which she can
11 respond to the purported reasons for revocation. *Cf. id.* As such, Mejia Iriarte is entitled
12 to immediate release on an OSUP until ICE can provide the minimal process required by
13 the regulations.

14 THIRD CAUSE OF ACTION

15 Unlawful Detention Where Removal is Not Reasonably Foreseeable

16 62. Mejia Iriarte re-alleges and incorporates by reference, as if fully set forth
17 herein, the allegations in paragraphs 1-55 above.

18 63. Post-removal order detention violates 8 U.S.C. § 1231(a)(6) where removal
19 is not significantly likely to occur in the reasonably foreseeable future. *See also*
20 *Zadvydas v. Davis*, 533 U.S. 678 (2001).

21 64. Detention where removal is not reasonably foreseeable also violates due
22 process.

23 65. The ninety-day removal period ended in April 2023. And ICE determined it
24 could not effectuate Mejia Iriarte's removal and issued her an OSUP. Given that the
25 United States did not then find—and in the intervening years has not since found—a third
26 country for removal, Mejia Iriarte has made an initial showing under *Zadvydas* that her
27 removal is not significantly likely. *Zadvydas*, 533 U.S. at 701. Respondents cannot rebut
28 this showing, as they do not have any individualized evidence to believe that Mejia

1 Iriarte's removal is reasonably foreseeable, as demonstrated by DO Martinez's statements
2 confirming that ICE had unsuccessfully attempted to remove Mejia Iriarte to Mexico ten
3 months after they re-detained her.

4 66. Mejia Iriarte's re-detention under these circumstances violates 8 U.S.C.
5 § 1231 and the Due Process Clause under the United States Constitution.

6 67. Mejia Iriarte is entitled to immediate release on an OSUP.

7 **FOURTH CAUSE OF ACTION**

8 **Unlawful Detention Without Individualized Determination of Danger or Flight Risk**

9 68. Mejia Iriarte re-alleges and incorporates by reference, as if fully set forth
10 herein, the allegations in paragraphs 1-55 above.

11 69. Detention violates 8 U.S.C. § 1231 and the Due Process Clause of the
12 United States Constitution unless it is reasonably related to the government's purpose of
13 preventing flight and protecting the community. *Zadvydas*, 533 U.S. at 690-91.

14 70. Before being re-detained, Mejia Iriarte lived in the community for six years,
15 in compliance with the terms of her OSUP. And she has received no process to determine
16 whether her re-detention is warranted.

17 71. Mejia Iriarte is entitled to an individualized determination by impartial
18 adjudicators as to whether detention is justified based on danger or flight. *See also Singh*
19 *v. Holder*, 638 F.3d 1196 (9th Cir. 2011).

20 **PRAYER FOR RELIEF**

21 Mejia Iriarte asks this Court to grant the following relief:

- 22 1. Assume jurisdiction over this matter;
- 23 2. Issue the writ of habeas corpus and order Respondents to show cause, within
24 three days of Mejia Iriarte's filing this petition, why the relief she seeks should not be
25 granted; and set a hearing on this matter within five days of Respondents' return on the
26 order to show cause (*see* 28 U.S.C. § 2243);
- 27 3. Declare that Respondents have violated Mejia Iriarte's rights;
- 28

1 4. Order Respondents to notify Mejia Iriarte of the reasons for the revocation
2 of her release and provide Mejia Iriarte with a prompt interview as required by
3 regulation;

4 5. Order Respondents to release Mejia Iriarte from detention because they lack
5 any individualized evidence that removal of Mejia Iriarte will occur in the reasonably
6 foreseeable future;

7 6. Order Respondents to release Mejia Iriarte from detention absent an
8 individualized determination by an impartial adjudicator that her detention is justified
9 based on danger or flight risk, which cannot be sufficiently addressed by alternative
10 conditions of release or supervision;

11 7. Enjoin Respondents from revoking Mejia Iriarte's release unless they have
12 individualized evidence that her removal is reasonably foreseeable;

13 8. Enjoin Respondents from revoking Mejia Iriarte's release without providing
14 her a determination by an impartial adjudicator that her detention is justified based on
15 danger or flight risk, which cannot be sufficiently addressed by alternative conditions of
16 release or supervision, at which hearing Respondents will bear the burden of proof of
17 demonstrating that Mejia Iriarte is a flight risk or a danger to the community;

18 9. Award reasonable attorneys' fees and costs under the Equal Access to
19 Justice Act, 28 U.S.C. § 2412(d), 5 U.S.C. § 504, or any other applicable law; and

20 10. Grant any other relief that the Court may deem just and proper.

21
22 Dated: November 13, 2025

Respectfully submitted,

23
24 By: /s/ Arwa J.Z. Kakavand
25 Arwa J.Z. Kakavand

26 Pro Bono Attorney for Petitioner
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TABLE OF EXHIBITS

- EXHIBIT A:** Form I-871, Notice of Intent/Decision to Reinstate Prior Order
- EXHIBIT B:** Order of the Immigration Judge
- EXHIBIT C:** Email exchange between counsel and U.S. Immigration and Customs Enforcement and Removal Operations, Deportation Officer Rosendo Martinez Jr., dated October 1, 2025
- EXHIBIT D:** Email from counsel to U.S. Immigration and Customs Enforcement and Removal Operations, Assistant Field Office Director Mark Paramo, and Deportation Officer Rosendo Martinez Jr., dated October 8, 2025
- EXHIBIT E:** Order of Supervision Documents

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**VERIFICATION BY SOMEONE ACTING ON PETITIONER'S BEHALF
PURSUANT TO 28 U.S.C. § 2242**

I, Arwa J.Z. Kakavand, do depose and state:

I represent Petitioner Mejia Iriarte in these habeas corpus proceedings. Mejia Iriarte is currently being held in detention at the Otay Mesa Detention Center and is not able to appear in my office to sign this Verification. I have reviewed the record of her detention and discussed this matter with Mejia Iriarte. I verify that the information contained in the foregoing petition is true and correct to the best of my knowledge and belief.

Dated: November 13, 2025

By: /s/ Arwa J.Z. Kakavand
Arwa J.Z. Kakavand

Pro Bono Attorney for Petitioner