

65, for entry of a temporary restraining order to prevent his removal by Immigration and Customs Enforcement (“ICE”) from the United States during the pendency of his petition for writ of habeas corpus. Petitioner is currently in ICE custody at the Joe Corley Processing Center, located at 500 Hilbig Road, Conroe, Texas 77301, and seeks emergency relief to obtain his release and prevent his unlawful removal to Cuba. In support thereof, Petitioner states the following:

II. FACTUAL BACKGROUND

Petitioner is a twenty-one old male native and citizen of Cuba. *See attached*, Exhibit A: Petitioner’s Identification. He fled Cuba on October 16, 2022 due to persecution and threats of violence against him and his family because of his previous political activism in that country. *See attached*, Exhibit B: Petitioner’s Form I-589 Application for Asylum.

On October 18, 2022, Petitioner entered the United States without inspection near Marathon, Florida. *See attached*, Exhibit C: Record of Sworn Statement in Proceedings under Section 235(b)(1) of the INA. On that same day, an Immigration Officer determined Petitioner was inadmissible and gave a notice and order of expedited removal. He was then released from custody and asked to check in with ICE Enforcement and Removal Operations . *See attached*, Exhibit D: Notice of Order and Expedited Removal. 16. On May 2, 2023, Petitioner filed to a Form I-589 Application for Asylum and for Withholding of Removal under the Convention Against Torture with USCIS. *See attached*, Exhibit B: *supra*. 17. On November 8, 2023 Petitioner was issued an Employment Authorization Document under the asylum category. *See attached*, Exhibit E: Work Permit. 18. On September 15, 2025, Petitioner was detained by ICE officers at his credible fear interview at USCIS offices. He was transferred to Joe Corley.

On September 24, 2025, the court conducted a credible fear review, at the conclusion of which the court affirmed the findings and conclusions of the Asylum Officer and returned the case to the DHS for respondent to be removed from the United States. *See attached*, Exhibit F: Order of the Immigration Judge. On that same day, after further review of the case, the Court determined that necessary components of the DHS credible fear determination were missing and ordered that the Court's September 24, 2025 oral decision and order affirming the findings and conclusions of the Asylum Officer is withdrawn and the DHS credible fear determination is vacated. . *See attached*, Exhibit F, *supra*. Petitioner has still not been released by ICE following the DHS credible fear determination being vacated and is still in custody to this day

On November 7 2025, Petitioner sent a parole request packet to U.S. Immigration and Customs Enforcement asking for a bond amount to be set to \$1500. The parole request packet has not been granted by ICE. *See attached*, Exhibit G, Parole Request Packet.

Petitioner is currently being detained under ICE custody undergoing removal proceedings at the Joe Corley Processing Center. The government has not been able to articulate any meaningful reason why Petitioner should continue to remain in detention despite the fact that no removal proceedings are pending against him. Petitioner, through Counsel, now submits the present Petition for Writ of Habeas Corpus to this Honorable Court, and respectfully requests the Court to order Respondents to effect his immediate release.

III. LEGAL STANDARD

The standard for granting a temporary restraining order ("TRO") in the Fifth Circuit requires the petitioner to demonstrate:

(1) a substantial likelihood of success on the merits;

- (2) a substantial threat of irreparable injury if the injunction is not granted;
 - (3) that the threatened injury outweighs any harm the injunction may cause the government; and
 - (4) that the injunction will not disserve the public interest.
- Mississippi Power & Light Co. v. United Gas Pipe Line Co.*, 760 F.2d 618, 621 (5th Cir. 1985).

In the immigration habeas context, a TRO serves to preserve this Court's jurisdiction and prevent continued unlawful restraint of liberty in violation of the Constitution and federal law. See *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

IV. ARGUMENT

A. Petitioner Faces Immediate and Irreparable Harm from Continued Detention

Petitioner has been detained by ICE since September 15, 2025, with no final order of removal having ever been issued against him and is subject to detention. Petitioner has no criminal history and poses no risk to the community. He has demonstrated no conduct indicating that he is a threat to the United States or otherwise eligible for deportation.

Petitioner's request for parole has not been granted by ICE. As a result, Petitioner has no administrative avenue for release and remains indefinitely detained without judicial review—an ongoing deprivation of his most fundamental liberty interest.

Continued confinement of a noncitizen without lawful authority constitutes irreparable harm. *Zadvydas*, 533 U.S. at 690; *Demore v. Kim*, 538 U.S. 510, 529–30 (2003). Each additional day of unlawful detention deepens the constitutional injury and cannot be remedied by monetary damages. See *Jennings v. Rodriguez*, 583 U.S. 281 (2018). Petitioner's prolonged confinement

also exacerbates his medical conditions, further establishing immediate and irreparable harm absent this Court's intervention.

B. Petitioner is Substantially Likely to Succeed on the Merits

Petitioner's detention is unlawful under 28 U.S.C. § 2241 because no final order of removal exists, and ICE has failed to justify his continued confinement. Under *Zadvydas*, detention authority under 8 U.S.C. § 1231(a) arises only after a removal order becomes final. In Petitioner's case, no final order of removal has been issued against him. Furthermore, despite his parole request, ICE has not granted Petitioner release on parole. Accordingly, the government lacks statutory authority to detain him under § 1231(a).

The Fifth Circuit has recognized that immigration detention must be narrowly tailored and subject to constitutional limits. *Zadvydas v. Underdown*, 185 F.3d 279 (5th Cir. 1999), rev'd on other grounds, 533 U.S. 678 (2001). Absent a final removal order or individualized finding of necessity, detention becomes arbitrary and violates substantive due process. See *Reno v. Flores*, 507 U.S. 292, 302 (1993).

Petitioner poses no flight risk or danger to the community—he has no criminal record, has complied with all ICE reporting requirements, and possesses valid work authorization. ICE's failure to articulate any legitimate reason for his detention demonstrates that it is punitive, not regulatory, and therefore unconstitutional. *Zadvydas*, 533 U.S. at 690–91.

For these reasons, Petitioner is substantially likely to prevail on the merits of his habeas corpus petition and is entitled to immediate release.

C. The Balance of Harms Favors Petitioner

The harm to Petitioner from continued unlawful detention—loss of liberty in a facility meant for criminal aliens, deterioration of health, and ongoing constitutional injury—vastly outweighs any administrative burden on the government in effecting her release under appropriate conditions. The government retains full authority to supervise Petitioner through reporting or monitoring conditions, rendering detention unnecessary to ensure appearance.

Where, as here, the government cannot articulate a lawful basis for custody, continued detention serves no legitimate purpose and inflicts disproportionate harm.

D. The Public Interest Supports Immediate Release

The public interest is served by ensuring that government detention authority is exercised within constitutional and statutory bounds. Upholding due process and preventing unlawful imprisonment preserves confidence in the rule of law and the integrity of immigration proceedings.

Granting the requested relief promotes judicial economy by ensuring this Court can fully adjudicate the habeas petition without the case becoming moot due to prolonged or arbitrary detention.

V. CONCLUSION

Because Petitioner has shown (1) a substantial likelihood of success on the merits of his habeas claim; (2) irreparable harm from continued detention; (3) that the balance of equities strongly favors release; and (4) that release under appropriate safeguards serves the public interest, this Court should grant the temporary restraining order and order Petitioner's **immediate release from ICE custody under appropriate safeguards determined by DHS.**

VI. REQUEST FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Honorable Court **IMMEDIATELY** issue a temporary restraining order:

1. **Directing Respondents to immediately release Petitioner from custody;**
2. Restraining and enjoining Respondent, their agents, employees, and successors from removing Petitioner from the United States;
3. Directing Respondent to take all necessary steps to halt any removal preparations;
4. Requiring Respondent to notify all relevant personnel that Petitioner shall not be removed;
5. Set an expedited hearing on Petitioner's motion for preliminary injunction;
6. After hearing, issue a preliminary injunction maintaining the relief requested above during the pendency of this action;
7. Waive or set security in a nominal amount;
8. Award attorney's fees and costs; and
9. Grant such other relief as this Court deems just and proper.

VII. SECURITY AND NOTICE

Petitioner respectfully requests that the Court waive the security requirement under Fed. R. Civ. P. 65(c) due to her indigent status, or alternatively, set security in a nominal amount.

Petitioner has taken reasonably calculated steps to effect service of process on each of the Respondents named herein, and has provided them with copies of the present motion as described in the Certificate of Service, below.

Respectfully submitted,

/s/ Matthew Mendez
Matthew Mendez
Attorney for Petitioner
State Bar No. 24098092
6300 Gulfton Street
Houston, Texas 77081
Tel. (346) 205-4343
matt@mendezlawoffice.com

CERTIFICATE OF EMERGENCY

I hereby certify that this motion seeks emergency relief due to Petitioner's imminent risk of removal, which would render his habeas corpus petition moot and cause irreparable constitutional harm.

/s/ Matthew Mendez
Matthew Mendez
Attorney for Petitioner

November 13, 2025
Date

CERTIFICATE OF CONFERENCE

I hereby certify that due to the emergency nature of this motion and the imminent threat of removal, I have been unable to confer with opposing counsel regarding this motion.

/s/ Matthew Mendez
Matthew Mendez
Attorney for Petitioner

November 13, 2025
Date

CERTIFICATE OF SERVICE

On November 13, 2025, Counsel for Plaintiff served a copy of the attached Motion via USPS Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Grant Dickey, in his Official Capacity as Co-Associate Warden of the Joe Corley Processing Center**, at (1) Office of the Warden, 500 Hilbig Road, Conroe, Texas 77301, and (2) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.

/s/ Matthew Mendez
Matthew Mendez
Attorney for Petitioner

November 13, 2025
Date

CERTIFICATE OF SERVICE

On November 13, 2025, Counsel for Plaintiff served a copy of the attached Motion via USPS Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Raymond Thompson, in his Official Capacity as Co-Associate Warden of the Joe Corley Processing Center**, at (1) Office of the Warden, 500 Hilbig Road, Conroe, Texas 77301, and (2) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.

/s/ Matthew Mendez
Matthew Mendez
Attorney for Petitioner

November 13, 2025
Date

CERTIFICATE OF SERVICE

On November 13, 2025, Counsel for Plaintiff served a copy of the attached Motion via USPS Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Bret Bradford, in his Official Capacity as Field Office Director, of ICE Enforcement and Removal Operations Houston Field Office**, at (1) Office of the Field Office Director, Enforcement and Removal Operations, Houston Field Office, 126 Northpoint Drive, Houston, Texas 77060, and (2) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.

/s/ Matthew Mendez
Matthew Mendez
Attorney for Petitioner

November 13, 2025
Date

CERTIFICATE OF SERVICE

On November 13, 2025, Counsel for Plaintiff served a copy of the attached Motion via USPS Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Kristi Noem, in her Official Capacity as Director of U.S. Department of Homeland Security**, at (1) Office of General Counsel, U.S. Department of Homeland Security, 245 Murray Lane, SW, Mail Stop 0485, Washington, D.C. 20530; and (2) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.

/s/ Matthew Mendez
Matthew Mendez
Attorney for Petitioner

November 13, 2025
Date

CERTIFICATE OF SERVICE

On November 13, 2025, Counsel for Plaintiff served a copy of the attached Motion via USPS Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Pam Bondi, in her Official Capacity as Attorney General of the United States**, at (1) U.S. Attorney General, 950 Pennsylvania Avenue, NW, Washington, D.C. 20530-0001; and (2) to the Assistant Attorney General for Administration, U.S. Department of Justice, Justice Management Division, 950 Pennsylvania Avenue, NW, Room 1111, Washington, D.C. 20530; and (3) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.

/s/ Matthew Mendez
Matthew Mendez
Attorney for Petitioner

November 13, 2025
Date

TABLE OF EXHIBITS

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U.S. Department of Homeland Security

Record of Sworn Statement in Proceedings under Section 235(b)(1) of the Act

Office: MARATHON, FL, BORDER PATROL STATION

File No. [REDACTED]
Event: [REDACTED]

Statement by: LOPEZ CRUZ, DENIS DANIEL

In the case of: DENIS DANIEL LOPEZ CRUZ

Date of Birth: [REDACTED]

Gender (select one): Male Female

At: MARATHON, FL, BORDER PATROL STATION

Date: October 16, 2022

Before: JAYDEN RICHARDS

BORDER PATROL AGENT

In the SPANISH

language. Interpreter

Employed by

I am an officer of the United States Department of Homeland Security. I am authorized to administer the immigration laws and to take sworn statements. I want to take your sworn statement regarding your application for admission to the United States. Before I take your statement, I also want to explain your rights, and the purpose and consequences of this interview.

You do not appear to be admissible or to have the required legal papers authorizing your admission to the United States. This may result in your being denied admission and immediately returned to your home country without a hearing. If a decision is made to refuse your admission into the United States, you may be immediately removed from this country, and if so, you may be barred from reentry for a period of 5 years or longer.

This may be your only opportunity to present information to me and the Department of Homeland Security to make a decision. It is very important that you tell me the truth. If you lie or give misinformation, you may be subject to criminal or civil penalties, or barred from receiving immigration benefits or relief now or in the future.

Except as I will explain to you, you are not entitled to a hearing or review.

U.S. law provides protection to certain persons who face persecution, harm or torture upon return to their home country. If you fear or have a concern about being removed from the United States or about being sent home, you should tell me so during this interview because you may not have another chance. You will have the opportunity to speak privately and confidentially to another officer about your fear or concern. That officer will determine if you should remain in the United States and not be removed because of that fear.

Until a decision is reached in your case, you will remain in the custody of the Department of Homeland Security.

Any statement you make may be used against you in this or any subsequent administrative proceeding.

Q. Do you understand what I've said to you?

A. YES

Q. Do you have any questions?

A. NO

Q. Are you willing to answer my questions at this time?

A. YES

Q. Do you swear or affirm that all statements you are about to make are true and complete?

A. YES

REFUSED TO SIGN

Tsing Galaxy A14 5G

**U.S. DEPARTMENT OF HOMELAND SECURITY
NOTICE TO ALIEN ORDERED REMOVED/DEPARTURE VERIFICATION**

A-File No. _____
Date _____

Alien's name: EDWIN DANIEL LOPEZ CRUZ

You have been found to be inadmissible to the United States under the provisions of section 212(a) of the Immigration and Nationality Act (Act) or deportable under the provisions of section 237 of the Act as a Visa Waiver Pilot Program violator. In accordance with the provisions of section 212(a)(9) of the Act, you are prohibited from entering, attempting to enter, or being in the United States:

- For a period of 5 years from the date of your departure from the United States as a consequence of your having been found inadmissible as an arriving alien in proceedings under section 235(b)(1) or 240 of the Act.
- For a period of 10 years from the date of your departure from the United States as a consequence of your having been ordered removed in proceedings under any section of the Act other than section 235(b)(1) or 240, or of being ordered excluded under section 238 of the Act in proceedings commenced prior to April 1, 1997.
- For a period of 20 years from the date of your departure from the United States as a consequence of being found inadmissible and being previously excluded, deported, or removed from the United States.
- At any time because in addition to being found inadmissible, you have been convicted of a crime designated as an aggravated felony.

After your removal has been effected, you must request and obtain permission from the Secretary of Homeland Security to reapply for admission to the United States during the period indicated. You must obtain such permission before commencing your travel to the United States. Application forms for requesting permission to reapply for admission may be obtained by contacting any United States Consulate or U.S. Department of Homeland Security office. Refer to the above for number when requesting forms or information.

WARNING FOR ALL REMOVED ALIENS: It is a crime under Title 18 United States Code, Section 1424, for an alien who has been removed from the United States to enter, attempt to enter, or be found in the United States without the Secretary of Homeland Security's express consent. Depending on the circumstances of the removal, conviction for this crime can result in imprisonment of a period of from 2 to 20 years and/or a fine up to \$250,000.

SPECIAL NOTICE TO SEX OFFENDERS: Federal Law requires a convicted sex offender, including an alien who has been removed from or otherwise departed the United States and subsequently returns, to register in each jurisdiction in the United States in which he or she resides, is employed, or is a student. Violation of this requirement can result in prosecution and imprisonment for up to 10 years under Title 18 United States Code, Section 2254.

JAYDEN M. RICHARDS
(Signature of officer taking printing)

BORIS PATRICK AGENT
(Title of officer)

MARATHON, FLORIDA
(Location of DHS Office)

Verification of Removal
(Complete this section for file copy only)

Departure Date	Port of Departure	Manner of Departure
Signature of Verifying Officer		Title of Officer



Photograph of Alien



Right Index Finger

(Signature of alien whose fingerprint and photograph appear above)

(Signature of official taking fingerprint)

GR



Department of Homeland Security
 Immigration and Customs Enforcement
 2805 SW 145TH AVE.
 MIRAMAR, FL 33025

Name: Lopez Cruz, Denis Daniel DOB [REDACTED]

Please EMAIL the office shown below immediately in connection with an official matter.

OFFICE Email Address:	ICE-FRO-MIA-MMO-ScheduleAppt-SMB@ice.dhs.gov											
DATE AND HOUR	<p>Upon your release from custody, you are required to check in with ICE Enforcement and Removal Operations using one of the following options:</p> <table border="1" data-bbox="475 982 1474 1129"> <thead> <tr> <th data-bbox="475 982 773 1031">With I-385</th> <th data-bbox="773 982 1076 1031">With Electronic Monitoring Device</th> <th data-bbox="1076 982 1474 1031">All others</th> </tr> </thead> <tbody> <tr> <td data-bbox="475 1031 773 1079">https://checkin.ice.gov/fos</td> <td data-bbox="773 1031 1076 1079">MIA-ATDUnit@dhs.dhs.gov</td> <td data-bbox="1076 1031 1474 1079">ICE-FRO-MIA-MMO-ScheduleAppt-SMB@ice.dhs.gov</td> </tr> <tr> <td data-bbox="475 1079 773 1129">As soon as possible.</td> <td data-bbox="773 1079 1076 1129">Within 72-hours</td> <td data-bbox="1076 1079 1474 1129">Within 72-hours</td> </tr> </tbody> </table> <p>Detailed instructions on how to schedule an appointment are attached.</p>			With I-385	With Electronic Monitoring Device	All others	https://checkin.ice.gov/fos	MIA-ATDUnit@dhs.dhs.gov	ICE-FRO-MIA-MMO-ScheduleAppt-SMB@ice.dhs.gov	As soon as possible.	Within 72-hours	Within 72-hours
With I-385	With Electronic Monitoring Device	All others										
https://checkin.ice.gov/fos	MIA-ATDUnit@dhs.dhs.gov	ICE-FRO-MIA-MMO-ScheduleAppt-SMB@ice.dhs.gov										
As soon as possible.	Within 72-hours	Within 72-hours										
REQUEST APPOINTMENT	INCLUDE YOUR NAME, ADDRESS, TELEPHONE NUMBER AND A#											

You must have a scheduled appointment prior to presenting yourself.
 Please only report at the scheduled date and time.

SIGNATURE	DATE

Very truly yours,

S.D. Jenkins

S.D. Jenkins
 Deportation Officer

EXHIBIT D

U.S. Department of Homeland Security

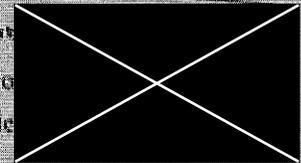
Notice and Order of Expedited Removal

DETERMINATION OF INADMISSIBILITY

Event

File No

Date



In the Matter of: DENIS DANIEL LOPEZ CRUZ

Pursuant to section 235(b)(1) of the Immigration and Nationality Act (Act), (8 U.S.C. 1225(b)(1)), the Department of Homeland Security has determined that you are inadmissible to the United States under section(s) 212(a) (6)(C)(i); (6)(C)(ii); (7)(A)(i)(I); (7)(A)(i)(II); (7)(B)(i)(I); and/or (7)(B)(i)(II) of the Act, as amended, and therefore are subject to removal, in that:

1. You are not a citizen or national of the United States;
2. You are a native of CUBA and a citizen of CUBA ;
3. You are an immigrant not in possession of a valid unexpired immigrant visa, reentry permit, border crossing card, or other valid entry document required by the Immigration and Nationality Act;

JAYDEN W. RICHARDS

BORDER PATROL AGENT

Name and title of immigration officer (Print)

Signature of immigration officer

ORDER OF REMOVAL UNDER SECTION 235(b)(1) OF THE ACT

Based upon the determination set forth above and evidence presented during inspection or examination pursuant to section 235 of the Act, and by the authority contained in section 235(b)(1) of the Act, you are found to be inadmissible as charged and ordered removed from the United States.

Name and title of immigration officer (Print)

Signature of immigration officer

Name and title of supervisor (Print)

Signature of supervisor, if available

Check here if supervisory concurrence was obtained by telephone or other means (no supervisor on duty).

CERTIFICATE OF SERVICE

I personally served the original of this notice upon the above-named person on _____ (Date)

Signature of immigration officer

EXHIBIT F

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
CONROE IMMIGRATION COURT
CONROE, TEXAS

Matter of)	
Denis Daniel Lopez Cruz,)	
<i>Respondent</i>)	
)	Case No. 
)	
)	IJ: Hon. Robert L. Powell
)	
In Credible Fear Proceedings)	Date: September 24, 2025
)	

Order of the Immigration Judge

On September 24, 2025, the Court conducted a credible fear review, at the conclusion of which the Court affirmed the findings and conclusions of the Asylum Officer and returned the case to the DHS for respondent to be removed from the United States.

On further review of the case, the Court determined that necessary components of the DHS credible fear determination were missing (*e.g.*, the Asylum Officer's interview notes).

ORDERED that the Court's September 24, 2025, oral decision and order affirming the findings and conclusions of the Asylum Officer is *withdrawn*.

FUTHER ORDERED that the DHS credible fear determination is VACATED.


 ROBERT L. POWELL
 Immigration Judge

CERTIFICATE OF SERVICE

SERVED BY: MAIL (M) PERSONAL SERVICE (P) ELECTRONIC SERVICE (E)

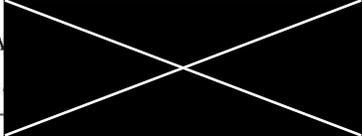
TO: ALIEN () ALIEN C/O CUSTODIAN () ALIEN'S ATT'Y/REP (X) DHS (E)

DATE: 9/24/25 BY: COURT STAFF SKO

ATTACHMENTS: EOIR-33 EOIR-28 LEGAL SERVICES LIST OTHER

EXHIBIT G

BOND REQUEST WORKSHEET

Alien's Name: Denis Daniel Lopez Cruz Alien Number: 

Attorney's Name: Matthew Mandt Phone Number: 

Interpreter requested _____ Language: Spanish

Initial Bond Set by DHS: _____ Bond Amount Requested: \$1500

Is the respondent subject to mandatory custody provisions of Section 236(c) of the Act?

Background Information: Age: 21 Marital Status: married Date of Marriage: 10/2022

Spouse's Status (e.g., USC or LPR): N/A Children (yes or no) Number of Children: 1

List children's names, dates of birth, and immigration status (if USCs, attach copies of birth certificates):

At  24 USC
(Child's Name) (DOB) (Status)

(Child's Name) (DOB) (Status)

(Child's Name) (DOB) (Status)

*Please use additional sheets if necessary

Birthplace of mother: Cuba Immigration Status: N/A

Birthplace of father: Cuba Immigration Status: LPR

Is the respondent claiming citizenship of the United States? NO If yes, will the claim be by birth in the U.S., naturalization, acquisition or derivation? _____

Does the respondent have any brothers or sisters in the United States? NO

List siblings' names, dates of birth and immigration status in the United States:

(Sibling's Name) (DOB) (Status)

(Sibling's Name) (DOB) (Status)

(Sibling's Name) (DOB) (Status)

*Please use additional sheets if necessary

Education (both in the U.S. and elsewhere): 

*Please use additional sheets to list schools attended, graduation dates, etc.

Dates of Entry: First date respondent entered the United States: 10/18/2022

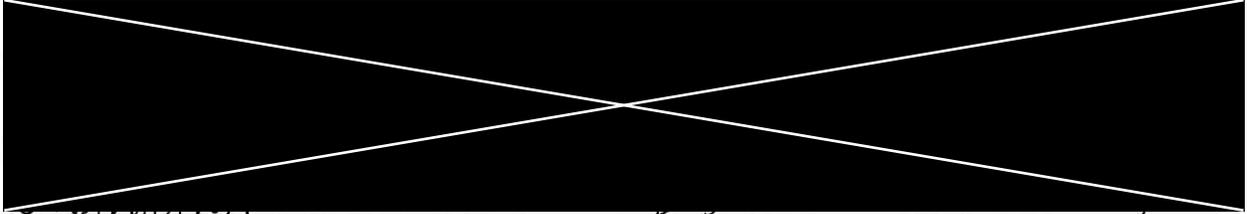
Last date respondent entered the United States: 10/18/2022 Current status: _____

Years Resided in the U.S. 3 yrs Date became Legal Permanent Resident: _____

Work Authorization: Does the respondent have authorization to work in the United States? yes

Has the respondent ever used illegal documentation to work in the U.S.? NO

List last three places of employment, dates of employment, and last salary received:



(Employer)

(Dates)

(Salary)

Criminal History: List all convictions, dates of convictions, sentences received and time served: NO

_____	_____	_____	_____
(Crime)	(Date Convicted)	(Sentence)	(Time Served)
_____	_____	_____	_____
(Crime)	(Date Convicted)	(Sentence)	(Time Served)
_____	_____	_____	_____
(Crime)	(Date Convicted)	(Sentence)	(Time Served)

*Please use additional sheets if necessary

Immigration Custody: Date the respondent came into custody of DHS/ICE: 9/15/25

How did the respondent come into custody of DHS/ICE? USOIS credible fear

List any previous deportations, voluntary departures, and voluntary returns: NO

Relief: List all forms of relief the respondent will seek: Asylum, Withholding of Removal, protection under Convention Against Torture (CAT)

Has anyone ever filed a petition for alien relative for the respondent? NO When? _____

Does the respondent own any real estate in the U.S.? If yes, how much equity? _____

Where will the respondent live if released? _____

With whom will the respondent reside? _____

*Other considerations:

*Please use additional sheets if necessary

CERTIFICATE OF SERVICE

On November 13, 2025, Counsel for Plaintiff served a copy of the attached Exhibits via USPS Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Grant Dickey, in his Official Capacity as Co-Associate Warden of the Joe Corley Processing Center**, at (1) Office of the Warden, 500 Hilbig Road, Conroe, Texas 77301, and (2) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.

/s/ Matthew Mendez
Matthew Mendez
Attorney for Petitioner

November 13, 2025
Date

CERTIFICATE OF SERVICE

On November 13, 2025, Counsel for Plaintiff served a copy of the attached Exhibits via USPS Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Raymond Thompson, in his Official Capacity as Co-Associate Warden of the Joe Corley Processing Center**, at (1) Office of the Warden, 500 Hilbig Road, Conroe, Texas 77301, and (2) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.

/s/ Matthew Mendez
Matthew Mendez
Attorney for Petitioner

November 13, 2025
Date

CERTIFICATE OF SERVICE

On November 13, 2025, Counsel for Plaintiff served a copy of the attached Exhibits via USPS Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Bret Bradford, in his Official Capacity as Field Office Director, of ICE Enforcement and Removal Operations Houston Field Office**, at (1) Office of the Field Office Director, Enforcement and Removal Operations, Houston Field Office, 126 Northpoint Drive, Houston, Texas 77060, and (2) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.

/s/ Matthew Mendez
Matthew Mendez
Attorney for Petitioner

November 13, 2025
Date

CERTIFICATE OF SERVICE

On November 13, 2025, Counsel for Plaintiff served a copy of the attached Exhibits via USPS Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Kristi Noem, in her Official Capacity as Director of U.S. Department of Homeland Security**, at (1) Office of General Counsel, U.S. Department of Homeland Security, 245 Murray Lane, SW, Mail Stop 0485, Washington, D.C. 20530; and (2) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.

/s/ Matthew Mendez
Matthew Mendez
Attorney for Petitioner

November 13, 2025
Date

CERTIFICATE OF SERVICE

On November 13, 2025, Counsel for Plaintiff served a copy of the attached Exhibits via USPS Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Pam Bondi, in her Official Capacity as Attorney General of the United States**, at (1) U.S. Attorney General, 950 Pennsylvania Avenue, NW, Washington, D.C. 20530-0001; and (2) to the Assistant Attorney General for Administration, U.S. Department of Justice, Justice Management Division, 950 Pennsylvania Avenue, NW, Room 1111, Washington, D.C. 20530; and (3) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.

/s/ Matthew Mendez
Matthew Mendez
Attorney for Petitioner

November 13, 2025
Date