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November 21, 2025

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By ECF

The Honorable Dale E. Ho
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Mejia Segovia v. Joyce, et al.*, 25-CV-9551 (DEH)

Dear Judge Ho:

On behalf of the Petitioner Ronald Alexander Mejia Segovia ("Petitioner"), in the above-captioned habeas corpus matter, undersigned counsel submits this letter in reply to Respondents' letter in lieu of a former response memorandum of law. Respondents' Memorandum of Law (ECF No.10).

SUPPLEMENTAL RELEVANT FACTS

In addition to the facts laid out in Petitioner's habeas petition and the facts provided in Respondents' letter, Pet. (ECF No.1) and Res. Mem. of Law (ECF No. 10), we provide these supplementary facts.

Petitioner, a native and citizen of El Salvador fled his country of origin following approximately four years of beatings, arbitrary detainments, threats to and attempts on his life by El Salvadoran law enforcement, in part due to his opposition to corruption and collusion with gangs.

Petitioner was arrested by ICE on November 14, 2025, when officers who, upon information and belief, did not identify their agency affiliation, encircled petitioner, removed personal property including his wallet from his pockets and forced him into a vehicle. Upon information and belief, the officers only identified themselves after they had taken Petitioner into custody. Following the arrest, upon information and belief, Respondents have transferred Petitioner three times in a week between November 14, 2025, and November 21, 2025. Petitioner was held in a holding cell in 26 Federal Plaza until he was transferred to Elizabeth Correctional

Facility either late in the night on November 14, 2025, or early in the morning on November 15, 2025. In the early morning of November 18, 2025, Petitioner was taken to Newark Airport and pressured to sign documents to facilitate his deportation which he refused to do. Upon information and belief, a call was received and he was subsequently transferred to the Orange County Correctional Facility on November 19, 2025. This morning, Petitioner was again moved to the Metropolitan Detention Center in Brooklyn, NY.

DISCUSSION

In light of the Respondents' concession that the Court's prior decisions in *Lopez v. Francis*, No. 25 Civ. 5937 (DEH), 2025 WL 2371588 (S.D.N.Y. Aug. 13, 2025), and *Torres v. Francis*, No. 25 Civ. 8408 (DEH), 2025 WL 3168759 (S.D.N.Y. Nov. 13, 2025), Petitioner will defer to the Court on whether this matter can be resolved without a conference. ECF No. 10.

We respectfully request that the Court grant the petition, holding that Petitioner's arrest was unlawful, ordering Petitioner's immediate release from ICE custody without the need of a bond hearing as exhaustion would be futile. Additionally, Petitioner was previously released on a \$12,000.00 bond. If the Court orders Petitioner's release on the previous conditions, we respectfully request the bond be reinstated inasmuch as DHS is still in possession of the \$12,000.00 bond.

I thank the Court for its consideration.

Respectfully submitted,



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