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**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**Miguel Anjel Pena-Ramirez,**  
Petitioner,

v.

**Kristi Noem**, Secretary of the United States Department  
of Homeland Security, in her official capacity;  
**Todd Lyons**, Acting Director of U.S. Immigration and  
Customs Enforcement, in his official capacity;  
**Sirce Owen**, Acting Director of EOIR, in her official  
capacity;  
**Bret Bradford**, Field Office Director for ICE's  
Enforcement and Removal Operation's ("ERO")  
Houston, Texas, in his official capacity;  
**Bryan Uhls**, Warden, Joe Corley Processing Center in  
his official capacity;  
Respondents.

Case No.

A No. 

**VERIFIED PETITION FOR  
WRIT OF HABEAS CORPUS  
PURSUANT TO 28 U.S.C. §  
2241**

**INTRODUCTION**

The Respondents are unlawfully detaining Petitioner Miguel Anjel Pena-Ramirez at the Joe Corley Processing Center in Conroe, Texas, because his Immigration Judge (IJ) held that he was subject to "mandatory detention."<sup>1</sup> Consistent with this position, the Department of Homeland Security (DHS) recently changed its long-standing position with regard to the status of mandatory detention.<sup>2</sup> And the Bureau of Immigration Appeals (BIA) issued a precedential decision on September 5, 2025, holding that

<sup>1</sup> *See*, 7/10/2025 Immigration Judge Order Denying Bond, filed herewith as Exhibit 1.

<sup>2</sup> *See*, ICE Memo: Interim Guidance Regarding Detention Authority for Applications for Admission (last visited September 8, 2025) (last visited September 8, 2025), filed herewith as Exhibit 2.

all noncitizens present in the United States without admission – no matter how long they have resided here – are still “applicants for admission” under 8 U.S.C. § 1225(a) and therefore subject to mandatory detention under § 1225(b)(2)(A). *See, Matter of Yajure Hurtado*, 29 I&N Dec. 216 (B.I.A. 2025).<sup>3</sup>

But this interpretation of the Immigration and Naturalization Act (INA) violates both procedural and substantive Fifth Amendment protections, ignores the plain statutory language of both § 1225 and § 1226, and is contrary to numerous recent Federal Court decisions in this District that have rejected these exact arguments. *See e.g. Buenrostro-Mendez v. Bondi, et al.*, 2025 WL 2886346, (S.D.Tex. 10/7/2025).<sup>4</sup>

Petitioner, a native and citizen of Mexico, has continuously resided in the United States for 29 years, since he entered in 1996.<sup>5</sup> On September 23, 2025, he filed an USCIS Form I-589 Application for Asylum and for Withholding of Removal and for protection under the Convention Against Torture.<sup>6</sup> He has worked in construction and delivery while raising a family in the United States.<sup>7</sup>

Because *Matter of Yajure Hurtado* is not binding,<sup>8</sup> this Court is in the best position to determine whether Mr. Pena-Ramirez was properly considered for release on bond. The petition for writ of habeas corpus should be granted.

### JURISDICTION & CUSTODY

1. Petitioner is currently detained at the Joe Corley Processing Center in Conroe, Texas and is under the direct control of Respondents and their agents.<sup>9</sup>

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<sup>3</sup> *See, Matter of Yajure Hurtado*, 29 I&N Dec. 216 (B.I.A. 2025), filed herewith as Exhibit 3.

<sup>4</sup> *See*, Memorandum and Order entered in *Buenrostro-Mendez v. Bondi, et al.*, Case No. H-25-3726 2025 WL 2886346 (S.D.Tex. 10/7/2025), filed herewith as Exhibit 4.

<sup>5</sup> *See*, Request for Bond Hearing And Documentation To Be Offered Into Evidence At Bond Hearing, filed herewith as Exhibit 5.

<sup>6</sup> *See*, USCIS Form I-589 Application for Asylum and for Withholding of Removal, filed herewith as Exhibit 6.

<sup>7</sup> *See*, Request for Bond Hearing and Documentation To Be Offered Into Evidence At Bond Hearing, filed herewith as Exhibit 5.

<sup>8</sup> In addition to BIA decisions not being binding precedent upon this Court, the Supreme Court decision last year in *Loper Bright Enterprises v. Raimondo*, 603 U.S. 369, 400 (2024), made clear that federal courts must independently interpret statutes and no longer defer to an Executive Branch agency's legal interpretations under so-called *Chevron* deference to agency interpretations of statutes.

<sup>9</sup> *See*, 10/26/2025 ICE Online Detainee Locator System report for Petitioner, available at <https://locator.ice.gov/odls/#/search>, filed herewith as Exhibit 7.

2. This action arises under the Constitution of the United States and 8 U.S.C. § 1101 *et seq.*

3. This Court has jurisdiction under 28 U.S.C. § 2241, Art. I § 9, cl. 2 of the United States Constitution, 28 U.S.C. § 1331, and the common law. This Court may grant relief pursuant to 28 U.S.C. § 2241, the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.

4. Congress has preserved judicial review of challenges to immigration detention. *See Jennings v. Rodriguez*, 583 U.S. 122, 130-131 (2018) (holding that 8 U.S.C. §§ 1226(e) and 1252(b)(9) do not bar review of challenges to prolonged immigration detention).

5. The Court must grant the petition for writ of habeas corpus or order Respondents to show cause “forthwith,” unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, Respondents must file a return “within three days unless for good cause additional time, not exceeding twenty days, is allowed.” *Id.*

6. The Court has inherent power to release the petitioner pending review of his petition. *See, Martin v. Solem*, 801 F.2d 324, 329 (8th Cir. 1986).

#### VENUE

7. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 493-500 (1973), venue lies in this Court, the federal judicial district in which Petitioner is currently is in custody.

8. Venue is also properly in this Court pursuant to 18 U.S.C. § 1391(e) because Respondents are employees, officers, and agencies of the United States.

#### PARTIES

9. Petitioner Miguel Anjel Pena-Ramirez was born on  in

Pihuamo, Mexico<sup>10</sup> and he is currently detained by ICE at the Joe Corley Processing Center in Conroe, Texas.<sup>11</sup>

10. Respondent Kristi Noem is the Secretary of the U.S. Department of Homeland Security (“DHS”). In this capacity, Respondent Noem is a legal custodian of Petitioner. Respondent Noem is sued in her official capacity.

11. Respondent DHS is a federal executive agency responsible for, among other things, enforcing federal immigration laws and overseeing lawful immigration to the United States. Respondent DHS is a legal custodian of Petitioner.

12. Respondent Todd M. Lyons is Acting Director and Senior Official Performing the Duties of the Director of U.S. Immigration and Customs Enforcement (“ICE”). Respondent Lyons is responsible for ICE’s policies, practices, and procedures, including those relating to the detention of immigrants during their removal procedures. Respondent Lyons is a legal custodian of Petitioner. Respondent Lyons is sued in his official capacity.

13. Respondent ICE is a federal law enforcement agency within DHS. Respondent ICE is responsible for the enforcement of immigration laws, including the detention and removal of immigrants. Respondent ICE is a legal custodian of Petitioner.

14. Respondent Bret Bradford is Field Office Director for ICE’s Enforcement and Removal Operation’s (“ERO”) Houston, Texas Field Office. Respondent Bradford is a legal custodian of Petitioner. Respondent Cantu is sued in his official capacity.

15. Respondent Sirce Owen is Acting Director of the Executive Office of Immigration Review. Respondent Owen is sued in her official capacity.

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<sup>10</sup> *See*, Request for Bond Hearing And Documentation To Be Offered Into Evidence At Bond Hearing, filed herewith as Exhibit 5.

<sup>11</sup> *See*, 10/26/2025 ICE Online Detainee Locator System report for Petitioner, available at <https://locator.ice.gov/odls/#/search>, filed herewith as Exhibit 7.

16. Respondent EOIR is a federal agency within the U.S. Department of Justice. Respondent EOIR is responsible for the administration of immigration courts, and acceptance of forms and petitions related to adjudication of immigration claims, as well as motions for bond.

17. Bryan Uhls is Warden of the Joe Corley Processing Center in Conroe, Texas and a legal custodian of Petitioner. Respondent Uhls is sued in his official capacity.

### STATEMENT OF FACTS

1. Petitioner Miguel Anjel Pena-Ramirez was born on  in Pihuamo, Mexico.<sup>12</sup>

2. Petitioner first entered the United States in 1996, without inspection, and has since maintained continuous residence, working in construction and delivery and raising a family.<sup>13</sup>

3. Petitioner had one Driving While Intoxicated (DWI) conviction in 2007, a misdemeanor B, for which his license was suspended for one year.<sup>14</sup>

4. ICE arrested Petitioner in June of 2025 and he is currently detained by ICE at the Joe Corley Processing Center in Conroe, Texas.<sup>15</sup>

5. On July 10, 2025, a custody redetermination hearing was held before an IJ where Petitioner submitted evidence, including: (a) His Birth Certificate; (b) His Marriage Certificate; (c) His Consular ID card; (d) His Criminal Record; (e) Several Character Reference Letters; and (e) Sponsor Documents.<sup>16</sup>

6. DHS did not submit any evidence at the custody redetermination hearing.

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<sup>12</sup> *See*, Request for Bond Hearing and Documentation To Be Offered Into Evidence At Bond Hearing, filed herewith as Exhibit 5.

<sup>13</sup> *Id.*

<sup>14</sup> *See*, Criminal Record attached as Exhibit D to Request for Bond Hearing And Documentation To Be Offered Into Evidence At Bond Hearing, filed herewith as Exhibit 5.

<sup>15</sup> *See*, 10/26/2025 ICE Online Detainee Locator System report for Petitioner, available at <https://locator.ice.gov/odls/#/search>, filed herewith as Exhibit 6.

<sup>16</sup> *See*, Request for Bond Hearing and Documentation To Be Offered Into Evidence At Bond Hearing, filed herewith as Exhibit 5.

7. On July 10, 2025, the IJ entered a summary decision denying bond merely stating “Mandatory detention, Flight risk.” *See*, Order Denying Bond at page 1.<sup>17</sup>

### LEGAL FRAMEWORK

8. “[A]liens who have once passed through our gates, even illegally, may be expelled only after proceedings conforming to traditional standards of fairness encompassed in due process of law”. *Shaughnessy v. United States ex rel. Mezei*, 345 U. S. 206, 212 (1953); *accord*, *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001).

9. Due process thus requires “adequate procedural protections” to ensure that the government’s asserted justification for a noncitizen’s physical confinement “outweighs the individual’s constitutionally protected interest in avoiding physical restraint.” *Zadvydas*, 533 U.S. at 690 (internal quotation marks omitted).

10. In the immigration context, the Supreme Court has recognized only two valid purposes for civil detention: to mitigate the risks of danger to the community and to prevent flight. *Demore v. Kim*, 538 U.S. 510, 528 (2003).

11. No analysis whatsoever was given for the denial of Petitioner’s bond request.<sup>18</sup> But it is clear that the IJ was promoting the DHS’s 7/8/2025 policy changes,<sup>19</sup> which now require that *any* person not previously admitted is subject to mandatory detention, without the possibility of release on bond, without regard to how long they have been present in the country.<sup>20</sup> But such a reading ignores the plain statutory language of § 1225(b)(1)(A)(iii)(II), which makes expedited removal procedures in that section conditioned upon the aliens having been present in the United States for under two years. Mr. Pena-Ramirez has lived in the United States for 29 years.

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<sup>17</sup> *See*, 7/10/2025 Immigration Judge Order Denying Bond, filed herewith as Exhibit 1.

<sup>18</sup> *Id.*

<sup>19</sup> *See*, ICE Memo: Interim Guidance Regarding Detention Authority for Applications for Admission (last visited September 8, 2025), filed herewith as Exhibit 2.

<sup>20</sup> *Id.*

12. Recent cases in this District have consistently rejected the Respondents' misinterpretation of § 1225:

- 1) On October 30, 2025, in *De La Caridad Mendez Velazquez v. Noem*, Case No. 25-cv-04527 (S.D.Texas 10-30-25), District Judge Keith P. Ellison entered an order denying Respondents' Motion to Dismiss and Granting in part Petitioner's Habeas Corpus Petition, stating that "[t]he Court has determined that the Petitioner is properly subject to 8 U.S.C. § 1226(a), rather than 8 U.S.C. § 1225(b)(2)."<sup>21</sup>
- 2) On October 29, 2025, in *Gamez-Chinchilla v. Dickey*, Case No. 25-cv-04427 (S.D. Texas 10-29-25) District Court Judge Alfred H. Bennett entered an order granting injunctive relief and ordering the immediate release of Petitioner, stating that "Petitioner is not an 'applicant for admission' subject to mandatory detention under § 1225(b)(2). He entered the United States over six years ago, applied for asylum, and has shown no conduct suggesting that he poses a threat to the United States."<sup>22</sup>
- 3) On October 27, 2025, in *Mejia Juarez v. Bondi*, Case No. 25-cv-03937 (S.D. Texas 10-27-25), District Judge Kenneth M.Hoyt entered an order granting the petition for a writ of habeas corpus and ordered the release of Petitioner upon receipt of his bond, stating that "[t]he Court concludes that § 1226, not § 1225, applies to Mejia-Juarez's detention. As almost every district court to consider this issue has concluded, 'the statutory text, the statute's history, Congressional intent, and § 1226(a)'s application for the past three decades' support finding that § 1226 applies to these circumstances."<sup>23</sup>
- 4) On October 23, 2025, in *Hernandez Lucero v. Noem*, Case No. 25-cv-03981 (SD Texas 10-23-25), District Judge Keith Ellison entered an order granting Petitioner's habeas request by requiring a bond hearing, saying "[t]he Court has determined that the Petitioner is not subject to 8 U.S.C. § 1225(b)(2) and it is hereby ORDERED that Petitioner be provided a bond hearing under 8 U.S.C. § 1226 by October 30, 2025."<sup>24</sup>
- 5) On October 21, 2025, in *Reyes-Lopez v. Noem*, Case No. 25-cv-04629 (S.D. Texas 10-21-25), U.S. Magistrate' Judge Dena Hanovice Palermo filed a Report & Recommendation recommending that Petitioner's writ of habeas corpus be

<sup>21</sup> See, Order entered 10/30/2025 denying Respondents' Motion to Dismiss and Granting in part Petitioner's Habeas Corpus Petition, in *De La Caridad Mendez Velazquez v. Noem*, Case No. 25-cv-04527 [docket no. 11] (S.D.Texas 10-30-25), filed herewith as Exhibit 8.

<sup>22</sup> See, Order entered 10/29/2025 granting in part Petitioner's motion for injunction relief in *Gamez-Chinchilla v. Dickey*, Case No. 25-cv-04427 (S.D. Texas 10-29-25) [docket no. 13] (S.D.Texas 10-30-25), filed herewith as Exhibit 9.

<sup>23</sup> See, Order entered 10/27/2025 in *Mejia Juarez v. Bondi*, Case No. 25-cv-03937 [docket no. 22] (S.D. Texas 10-27-25), filed herewith as Exhibit 10.

<sup>24</sup> See, Order entered 10/23/2025 in *Hernandez Lucero v. Noem*, Case No. 25-cv-03981 [docket no. 22] (S.D. Texas 10-23-25), filed herewith as Exhibit 11.

granted in part, and that Respondents provide her with a bond hearing within 14 days from of adoption of the recommendation, stating that “[s]ection 1226(a), not § 1225(b), applies to Reyes-Lopez.”<sup>25</sup>

- 6) On October 14, 2025, in *Lopez Baltazar v. Vasquez*, Case No. 25-cv-00160 (S.D. Texas 10-14-25), District Court Judge Marina Garcia Marmolejo entered an order granting in part and denying in part Petitioner’s writ of habeas corpus, stating that “the Court finds section 1226 applies to Petitioner’s detention.”<sup>26</sup>
- 7) On October 8, 2025, in *Padron Covarrubias v. Vergara*, Case No. 25-cv-00112 (SD Texas 10-08-25), District Court Judge John A. Kazen entered a Memorandum Opinion and Order granting in part Petitioner’s habeas petition, stating that “Reading Subsection 1226(c), which applies by its terms to both “deportable” aliens and “inadmissible” aliens, in harmony with Subsection 1226(a), Padron is detained under Subsection 1226(a) and is entitled to a bond hearing. Along with most other courts that have considered this issue, the Court finds that Padron is not properly detained without a bond hearing under Section 1225, and instead, Section 1226 applies.”<sup>27</sup>
- 8) On October 7, 2025, in *Buenrostro-Mendez v. Bondi*, No. H-25-3726 (S.D. Tex.10-07-25), Senior U.S. District Court Judge Lee H. Rosenthal entered a Memorandum and Order granting in part Petitioner’s writ of habeas corpus and ordering respondents to conduct a bond hearing within 14 days, saying that “Turning to the merits, the court concludes that § 1226, not § 1225, applies to Buenrostro’s detention. As almost every district court to consider this issue has concluded, “the statutory text, the statute’s history, Congressional intent, and § 1226(a)’s application for the past three decades” support finding that § 1226 applies to these circumstances.”<sup>28</sup>

13) DHS’s interpretation defies the INA. As the *Buenrostro-Mendez v. Bondi* court and other courts explained, the plain text of the statutory provisions demonstrates that § 1226(a), not § 1225(b), applies to persons who have resided in the United States for more than 2 years – like Petitioner.

14) The Bureau of Immigration Appeals, perhaps recognizing the increasing swell of adverse decisions, recently issued Interim Decision #4125, affirming an IJ’s determination that he did

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<sup>25</sup> See, Memorandum and Order entered *Lopez Baltazar v. Vasquez*, Case No. 25-cv-00160 [docket no. 10] (S.D. Texas 10-14-25), filed herewith as Exhibit 4.

<sup>26</sup> See, Magistrate’s Report & Recommendation, *Reyes-Lopez v. Noem*, Case No. 25-cv-04629 [docket no. 27] (S.D. Texas 10-21-25) filed herewith as Exhibit 12.

<sup>27</sup> See, 10/08/25 Memorandum Opinion and Order in *Padron Covarrubias v. Vergara*, Case No. 25-cv-00112 [docket no. 30] (SD Texas 10-08-25), filed herewith as Exhibit 13.

<sup>28</sup> See, 10/7/25 Memorandum Opinion and Order in *Buenrostro-Mendez v. Bondi*, No. H-25-3726 [docket no. 18] (S.D. Tex.10-07-25), filed herewith as Exhibit 14.

not have authority to issue a bond because noncitizens present in the United States without admission are “applicants for admission” as defined under section § 1225(b)(2)(A), and must therefore be detained for the duration of their removal proceedings. *See, Matter of Yajure Hurtado*, 29 I&N Dec. 216 (B.I.A. 2025).<sup>29</sup>

15) However, the Supreme Court decision last year in *Loper Bright Enterprises v. Raimondo*, 603 U.S. 369 (2024) expressly overruled *Chevron*<sup>30</sup> deference to agency interpretations of statutes. Federal courts are now restored to their traditional Judicial Branch role of “us[ing] every tool at [their] disposal to determine the best reading of the statute.” *See Loper Bright*, 603 U.S. at 412-13.

16) Thus, this Court is the proper forum to determine whether Petitioner is entitled to immediate release as a DACA recipient or, alternatively, upon a reversal of *Yajure Hurtado*. The petition for writ of habeas corpus should be granted.

17) At his bond hearing, Petitioner emphasized his strong ties to the community and submitted multiple letters of support.<sup>31</sup>

18) DHS did not submit any evidence, yet the IJ denied bond on the grounds that Petitioner is subject to “mandatory detention”.

**CLAIMS FOR RELIEF**  
**FIRST CLAIM FOR RELIEF**

Violation of Fifth Amendment – Substantive Due Process

19) Petitioner realleges and incorporates herein the allegations contained in the preceding paragraphs of the petition as if fully set forth herein.

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<sup>29</sup> *See, Matter of Yajure Hurtado*, 29 I&N Dec. 216 (B.I.A. 2025), filed herewith as Exhibit 3.

<sup>30</sup> *Chevron v. Natural Resources Defense Council*, 467 U.S. 837 (1984).

<sup>31</sup> *See*, Request for Bond Hearing and Documentation To Be Offered Into Evidence At Bond Hearing, filed herewith as Exhibit 5.

20) The Due Process Clause of the Fifth Amendment forbids the government from depriving any “person” of liberty “without due process of law,” including noncitizens. U.S. Const. amend. V.

21) Substantive due process asks whether a person’s life, liberty, or property is deprived without sufficient purpose. There is no question that Petitioner has been deprived of his liberty in this case.

22) The government’s continued detention of Petitioner is not supported by any special interest or compelling justification that outweighs his liberty interest.

23) Petitioner’s ongoing detention when so many federal courts have held that he is entitled to be considered for release upon posting an appropriate bond under § 1226 constitutes prolonged detention and violates his substantive due process rights.

**SECOND CLAIM FOR RELIEF**  
**Violation of Fifth Amendment Right - Procedural Due Process**

24) Petitioner realleges and incorporates herein the allegations contained in the preceding paragraphs of the petition as if fully set forth herein.

25) The Due Process Clause of the Fifth Amendment guarantees Petitioner the right to procedural due process in seeking a bond redetermination and the government may not unreasonably restrict this right.

26) There is no factual basis upon which to classify Petitioner as a “arriving alien” under § 1225(a). He has been present in the United States for more than 29 years.

13) The government’s knowing misclassification of Petitioner as an “applicant for admission” under § 1225 in order to justify its argument for mandatory detention is not supported by any special interest or compelling justification that outweighs Petitioner’s liberty interest.

14) The continued detention of Petitioner is not supported by any special interest or compelling justification that outweighs his liberty interest.

**THIRD CLAIM FOR RELIEF**  
**Ultra Vires Policy**

15) Petitioner realleges and incorporates herein the allegations contained in the preceding paragraphs of the petition as if fully set forth herein.

16) This Court has authority to set aside executive actions and policies that are *ultra vires*. See *City of Arlington, Tex. v. FCC*, 569 U.S. 290, 297 (2013) (where agencies “act improperly, no less than when they act beyond their jurisdiction, what they do is *ultra vires*”); *Hawaii v. Trump*, 878 F. 3d 662, 682 (9th Cir. 2017), *rev’d on other grounds*, 585 U.S. 667 (2018) (an equitable cause of action outside of the APA “allows courts to review *ultra vires* actions” by federal officials that go beyond their statutory authority); *Mirzaie v. Dep’t of State*, No. 2:24-cv-00830-MRA-AJR (C.D. Cal. Jan. 31, 2024).

17) Respondents’ “new policies” regarding mandatory detention during removal proceedings are *ultra vires*. Respondents plainly lack statutory authority to deny Petitioner bond on the basis of “mandatory detention” when he has resided in the country for almost 30 years. Congress unambiguously established that an individual may not be subject to expedited removal if they can establish that they resided in the United States continuously for two years prior to the initiation of expedited removal proceedings. See 8 U.S.C. § 1225(b)(1)(A)(iii)(II).

**PRAYER FOR RELIEF**

**WHEREFORE** Petitioner Pena-Ramirez respectfully requests that the Court grant the following relief:

1. Assume jurisdiction over this matter;
2. Order the immediate release of Petitioner pending these proceedings, pursuant to the

Court's inherent powers;

3. Declare that Petitioner's arrest and continued detention are unlawful;
4. If Petitioner is not immediately released, order Respondents not to transfer Petitioner out of this District during the pendency of these proceedings, to preserve jurisdiction;
5. Issue a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 and order Respondents to immediately release Petitioner from custody or, in the alternative, order Respondents to show cause why this Petition should not be granted within three days;
6. Award Petitioner his costs and reasonable attorneys' fees pursuant to the Equal Access to Justice Act, 28 U.S.C. § 2412, and any other applicable authority; and
7. Grant any further relief the Court deems just and proper.

DATED this 13th day of November, 2025.

By: */s/ Nera Shefer*  
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Verification by Someone Acting on Petitioner's Behalf Pursuant to 28 U.S.C. § 2242

I represent Petitioner, Miguel Anel Pena-Ramirez, and submit this verification on his behalf. I have discussed with Petitioner the events described in this Petition. On the basis of those discussions, I hereby verify that the statements made in this Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated this 13<sup>th</sup> day of November, 2025.

By: */s/ Nera Shefer*

Nera Shefer, Esq.

<b>LIST OF EXHIBITS</b>	
<b>Exhibit 1</b>	<b>7/10/2025 Immigration Judge Order Denying Bond</b>
<b>Exhibit 2</b>	<b><u>ICE Memo: Interim Guidance Regarding Detention Authority for Applications for Admission</u> (last visited September 8, 2025)</b>
<b>Exhibit 3</b>	<b><i>Matter of Yajure Hurtado</i>, 29 I&amp;N Dec. 216 (B.I.A. 2025)</b>
<b>Exhibit 4</b>	<b>Memorandum and Order entered in <i>Buenrostro-Mendez v. Bondi, et al.</i>, Case No. H-25-3726 2025 WL 2886346 (S.D.Tex. 10/7/2025)</b>
<b>Exhibit 5</b>	<b>Request for Bond Hearing And Documentation To Be Offered Into Evidence At Bond Hearing</b>
<b>Exhibit 6</b>	<b>USCIS Form I-589 Application for Asylum and for Withholding of Removal</b>
<b>Exhibit 7</b>	<b>10/6/2025 ICE Online Detainee Locator System report for Petitioner, available at <a href="https://locator.ice.gov/odls/#/search">https://locator.ice.gov/odls/#/search</a></b>
<b>Exhibit 8</b>	<b>Order entered 10/30/2025 denying Respondents' Motion to Dismiss and Granting in part Petitioner's Habeas Corpus Petition, in <i>De La Caridad Mendez Velazquez v. Noem</i>, Case No. 25-cv-04527 [docket no. 11] (S.D.Texas 10-30-25)</b>
<b>Exhibit 9</b>	<b>Order entered 10/29/2025 granting in part Petitioner's motion for injunction relief in <i>Gamez-Chinchilla v. Dickey</i>, Case No. 25-cv-04427 (S.D. Texas 10-29-25) [docket no. 13] (S.D.Texas 10-30-25)</b>
<b>Exhibit 10</b>	<b>Order entered 10/27/2025 in <i>Mejia Juarez v. Bondi</i>, Case No. 25-cv-03937 [docket no. 22] (S.D. Texas 10-27-25), filed herewith as Exhibit 10.</b>
<b>Exhibit 11</b>	<b>Order entered 10/23/2025 in <i>Hernandez Lucero v. Noem</i>, Case No. 25-cv-03981 [docket no. 22] (S.D. Texas 10-23-25), filed herewith as Exhibit 11</b>
<b>Exhibit 12</b>	<b>Magistrate's Report &amp; Recommendation, <i>Reyes-Lopez v. Noem</i>, Case No. 25-cv-04629 [docket no. 27] (S.D. Texas 10-21-25) filed herewith as Exhibit 12.</b>
<b>Exhibit 13</b>	<b>10/08/25 Memorandum Opinion and Order in <i>Padron Covarrubias v. Vergara</i>, Case No. 25-cv-00112 [docket no. 30] (SD Texas 10-08-25), filed herewith as Exhibit 13.</b>
<b>Exhibit 14</b>	<b>10/8/25 Memorandum Opinion and Order in <i>Padron Covarrubias v. Vergara</i>, Case No. 25-cv-00112 [docket no. 30] (SD Texas 10-08-25)</b>

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 16, 2025, I served the attached document by electronic mail on the following entities, as no parties have yet entered appearances for the Respondents in this case:

**United States Attorney**  
**1000 Louisiana Street**  
**Suite 2300**  
**Houston TX 77002**  
[USATXS.CivilNotice@usdoj.gov](mailto:USATXS.CivilNotice@usdoj.gov)

**Bryan Uhls, Warden**  
**Joe Corley Processing Center**  
**500 Hilbig Street**  
**Conroe, Texas 77301**  
[BUhls@geogroup.com](mailto:BUhls@geogroup.com)

*By: /s/ Sheryl Serreze Mayer*  
Sheryl Serreze Mayer  
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