

Petitioner maintains that if the BIA rules that the bond granted should be rescinded and Petitioner be re-detained, Petitioner would need to return to this Court to review the continued detention of Petitioner. As such, Petitioner requests that this case remains open until the conclusion of the BIA appeal filed by the Respondents, and a status advisory should be ordered in three months for the parties to advise the Court.

On the contrary, with nothing further to present or argue in this matter, Respondents request the entry of a final judgment based on the Court's ruling in Dkt. No. 19. Respondents maintain that doing so would resolve all claims currently pending in this case; new claims, if they arise at all, may not accrue for some time since Petitioner is not in Respondents' custody and it may take more than six months for the BIA to render a decision on the bond appeal. Respondents maintain their disagreement with the Court's ruling and reserve their right to appeal the Court's ruling.

Dated: January 16, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Ancy Thomas, Assistant United States Attorney for the Southern District of Texas, do hereby certify that on this 16th day of January 2026, a copy of the foregoing was filed on the Court's CM/ECF system.

By: s/ *Ancy Thomas*
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