

The Sixth Circuit further held that noncitizens within the interior of the United States are entitled to the protections of the Due Process Clause. *Id* at 21. The Sixth Circuit held that the government's detention of petitioners without bond under §1226(a) was a deprivation of liberty that violated petitioner's due process rights. *Id* at 24. The Sixth Circuit held that district courts did not err in holding that petitioners were due individualized bond hearings in light of the significant time they have spent within the interior of the United States. The same principle applies to the petitioner here, who has resided for over twenty years and has not sought admission within the United States. This court should reconsider its previous habeas denial order from April 1, 2026 and grant the petitioner's habeas petition after new law was issued from the Sixth Circuit Court of Appeals.

Respectfully submitted,

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