

IN THE UNITED STATES DISTRICT COURT
OF THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

Daniel Alejandro HERNANDEZ CACERES,)	
)	Case No. 3:25-cv-3167
Petitioner,)	
)	PETITION FOR WRIT OF
v.)	HABEAS CORPUS
)	
Thomas BERGAMI, Warden, Prairieland)	
Detention Center; Joshua JOHNSON, Acting)	
Director of Dallas Field Office, U.S. Immigration)	
and Customs Enforcement; Todd LYONS,)	
Acting Director of Immigration and Customs)	
Enforcement; Kristi NOEM, Secretary of the)	
U.S. Department of Homeland Security; Pam)	
BONDI, Attorney General of the United States;)	
in their official capacities,)	
)	
Respondents.)	

**PLEADING REGARDING NOTICE TO RESPONDENTS OF MOTION FOR
TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

According to the Order from the Court dated November 26, 2025 at Dkt. No. 6, Petitioner was directed to provide notice of its Motion for Temporary Restraining Order and Preliminary Injunction to Respondent in a manner designed to apprise them of the Motion and to file a pleading on the docket explaining how it provided such notice. Pursuant to that Order, Petitioner provides proof of service and states the following:

1. Before filing the Motion with the Court, Petitioner sent an email in the morning of November 26, 2025 to the Counsels of Respondents where he informed them of his intention of filing the Motion and he requested their position to the Motion. Counsels responded to the email indicating that they opposed such a Motion. App. p.1-3.

2. After Petitioner filed the Motion with the Court through the electronic case filing system and the Court issued the Order, Petitioner sent an email in the afternoon of November 26, 2025 to the Counsels of Respondents where he informed them that he filed the Motion and attached copies of the Motion and the Motion's supporting documents to the email. App. p.4.
3. In addition to sending via email the notice of the Motion, Petitioner sent by mail to the Counsels of Respondents at the their last known address the Motion and the Motion's supporting documents. App. p.5-8.

DATED this 26th of November 2025.

Respectfully submitted,

/s/ Oscar Jesus Mendoza Esq.

Oscar Jesus Mendoza
Texas State Bar No. 24093631
The Law Office of Oscar Mendoza, PLLC
P.O. Box 600046
Dallas, TX 75360
469-426-1861
omendoza@omendozalaw.com

Attorney for Petitioner

CERTIFICATE OF SERVICE

On November 26, 2025, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

DATED: November 26, 2025.

/s/ Oscar Jesus Mendoza Esq.
Attorney for Petitioner