

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA

JAHYR JESUS
RODRIGUEZ ROSAS,

Petitioners/Plaintiff, v.

Case NO. 2:25-cv-01002-JES- DNF

KRISTI NOEM, in their official capacity as Secretary of the United States Department of Homeland Security;

PAMELA BONDI, in their official capacity as Attorney General of the United States;

MATTHEW MORDANT, in their official capacity as Alligator Alcatraz Field Office Director for Enforcement and Removal Operations, United States Immigration and Customs Enforcement;

GARRET RIPA, in their Official capacity as, Director of Miami Field Office, U.S. Immigration and Customs Enforcement;

TODD LYONS, in their official capacity as Acting Director of Immigration and Customs Enforcement

CHARLES PARRA, in their official capacity as Assistant Field Office Director for the Krome North Service

SIRCE OWEN, Acting Director of EOIR, in their official capacity; Executive Office for Immigration Review

Respondents-Defendants.

**PETITIONER'S MEMORANDUM IN SUPPORT OF HABEAS RELIEF
PURSUANT TO 28 U.S.C. § 2243.**

Petitioner, through undersigned counsel, respectfully submits this memorandum in support of the Court's prompt adjudication of the pending Petition for Writ of Habeas Corpus.

On November 20, 2025, the federal district court for the Central District of California, granted a partial summary judgment rejecting Matter of Yajure Hurtado and the predecessor ICE policy applying 235(b)(2)(A) detention without bond to all persons who entered without admission/inspection. (*See Exhibit B*, Summary Judgement). On November 25, 2025, the same court issued a class certification. (*See Exhibit A*, attached order of the class certification).

The declaratory judgment in favor of the certified class to which Petitioner indisputably belongs, finding that the detention of class members under the challenged statutory and regulatory framework is unlawful. That judgment conclusively establishes that Petitioner's ongoing detention violates federal law.

Accordingly, and pursuant to 28 U.S.C. § 2243, Petitioner respectfully requests that this Court grant the writ forthwith, as Petitioner is a class member whose detention has now been judicially declared unlawful.

Respectfully submitted this 26th day of November 2025.

/s/ Juliana G. Lamardo, Esq.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 26, 2025, I electronically filed the foregoing with the Clerk of Courts using the CM/ECF. I further certify that the foregoing was served on all counsel of record via CM/ECF.

/s/ Juliana G. Lamardo, Esq.

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