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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

I.E.,

Petitioner-Plaintiff,

v.

Jeremy CASEY, Warden, Imperial Regional Detention Facility;

Gregory J. ARCHAMBEAULT, Acting Field Office Director of San Diego Office of Detention and Removal, U.S. Immigrations and Customs Enforcement; U.S. Department of Homeland Security;

Todd M. LYONS, Acting Director, Immigration and Customs Enforcement, U.S. Department of Homeland Security;

Kristi NOEM, in her Official Capacity, Secretary, U.S. Department of Homeland Security; and

Pamela BONDI, in her Official Capacity, Attorney General of the United States;

Respondents-Defendants.

Case No. 3:25-cv-03227-DMS-DDL

PETITIONER'S REPLY TO RESPONDENTS' RETURN TO PETITION AND OPPOSITION TO MOTION FOR INJUNCTIVE RELIEF

The Petitioner, Mr. E, respectfully submits the following reply to the Respondents' Return to Petition and Opposition to Motion for Injunctive Relief.

I. ARGUMENT

A. The district court has jurisdiction to consider Mr. E's habeas petition.

This court has jurisdiction to grant Mr. E, a detainee in custody of the United States, habeas relief pursuant to 8 U.S.C. § 2241. The Respondents' argument that 8 U.S.C. § 1252(g) deprives this Court of jurisdiction to hear Mr. E's claim has been rejected by multiple courts within this district. *See, e.g., Vasquez Garcia v. Noem*, No. 25-cv-02180-DMS-MMP, 2025 WL 2549431, at *4 (S.D. Cal. Sept. 3, 2025); *Gao v. LaRose*, No.: 25-cv-2084-RSH-SBC, 2025 WL 2770633, at *2 (S.D. Cal. Sept. 26, 2025). Furthermore, the Ninth Circuit has also rejected the proposition that § 1252(g) bars habeas challenges to immigration detention. *See Bello-Reyes v. Gaynor*, 985 F.3d 696, 700 n.4 (9th Cir. 2021).

Section 1252(g) provides that "no court shall have jurisdiction to hear any cause or claim by or on behalf of any alien arising from the decision or action by the Attorney General to commence proceedings, adjudicate cases, or execute removal orders against any alien under this chapter." As the Court in *Gao* noted, "The Supreme Court has interpreted the jurisdiction-stripping provision in Section 1252(g) provisions narrowly, limiting it to "three discrete actions": the "'decision or action' to '*commence* proceedings, *adjudicate* cases, or *execute* removal orders.'" 2025 WL 2770633, at *2 (quoting *Reno v. Am.-Arab Anti–Discrimination Comm.*, 525 U.S. 471, 482 (1999)). The Supreme Court later explained that it did not read §1252(g) "to sweep in any claim that can technically be said to 'arise from' the three listed actions of the Attorney General. Instead, we read the language to refer to just those three specific actions themselves." *Gao*, 2025 WL 2770633, at *2 (quoting *Jennings v. Rodriguez*, 583 U.S. 281, 294 (2018)). The district court, noting that the petitioner was merely seeking to review the legality of his detention under the Due Process Clause rather than relitigate the Immigration Judge's order

in his removal proceedings, concluded that the petitioner's claim is not barred by § 1252(g). *Gao*, 2025 WL 2770633, at *2. The court added, "Respondents have not cited any authority in which a court was found to lack subject matter jurisdiction over such a habeas claim." *Id.*

In *Vasquez-Garcia*, the district court likewise determined that § 1252(g) should be read narrowly. 2025 WL 2549431, at *4. The district court reasoned, "Section 1252(g) 'does not prohibit challenges to unlawful practices merely because they are in some fashion connected to removal orders.'" *Id.* (quoting *Ibarra-Perez v. United States*, No. 24-631, at *18 (9th Cir. Aug. 27, 2025)). As the court found, "§ 1252(g) does not bar due process claims." *Id.* (citing *Walters v. Reno*, 145 F.3d 1032, 1032 (9th Cir. 1998)). The district court explained that the petitioners were not contesting the charges brought against them or the initiation of their removal proceedings, but rather they were seeking a bond hearing to determine their detention status during removal proceedings. *Id.* Because the petitioners were "enforcing their constitutional rights to due process in the context of removal proceedings—not the legitimacy of the removal proceedings or any removal order," the district court concluded that § 1252(g) did not apply. *Id.*

In the instant case, Mr. E does not challenge the Respondents' decision to commence removal proceedings against him, adjudicate his removal case, or to execute any removal order. Instead, Mr. E seeks to review the legality of his detention under the Due Process Clause and enforce his constitutional rights to due process in the context of removal proceedings. As the Ninth Circuit and the aforementioned district courts have determined, such actions are not barred under § 1252(g). Accordingly, this Court has jurisdiction to hear Mr. E's claims.

B. Mr. E is likely to succeed in his constitutional claim for relief under the Due Process Clause.

1. As multiple courts in this district have held, noncitizens subject to mandatory detention under 8 U.S.C. § 1225(b) have a constitutional right under the Due Process Clause against prolonged mandatory detention.

"'It is well established that the Fifth Amendment entitles [noncitizens] to due process of law in deportation proceedings.'" *Demore v. Kim*, 538 U.S. 510, 523 (2003) (quoting *Reno v. Flores*, 507 U.S. 292, 306 (1993)). Yet, the Respondents argue that Mr. E has no due process rights other than those afforded to him by Congress because he is subject to mandatory detention under 8 U.S.C. § 1225(b).[1] ECF 7 at pgs. 6-8. However, multiple district courts within the Southern District of California have resoundingly rejected this argument. *See Gao*, 2025 WL 2770633, at *3; *Kydyrali v. Wolf*, 499 F. Supp. 3d 768, 770-72 (S.D. Cal. Nov. 4, 2020); *Sadeqi v. LaRose*, No.: 25-cv-2587-RSH-BJW, 2025 WL 3154520, at *2 (S.D. Cal. Nov. 12, 2025); *Hoyos Amado v. U.S. DOJ,* No.: 25cv2687-LL(DDL), 2025 WL 3079052, at *3-5 (S.D. Cal. Nov. 4, 2025); *Abdul Kadir v. LaRose*, No.: 25cv1045-LL-MMP, 2025 WL 2932654, at *3-4 (S.D. Cal Oct. 15, 2025); *D.D. v. LaRose*, No. 25-cv-02581-BJC-JLB (Oct. 22, 2025) (slip op at 6-7). Indeed, in *Gao*, the district court noted that most courts have rejected this argument. 2025 WL 2770633, at *3; *see also Kydrali*, 499 F. Supp. 3d at 772 n.2 (collecting cases); *Abdul-Samed v. Warden of Golden State Annex Det. Facility*, No. 25-cv-98-SAB-HC, 2025 WL 2099343, at *6 (E.D. Cal. July 25, 2025) ("[E]ssentially all district courts that have considered the issue agree that prolonged mandatory detention pending removal proceedings, without a bond hearing, will—at some point—violate the right to due process." (internal quotations omitted).[2] Moreover, as discussed below, the Respondents'

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[1] The Respondents claim that Mr. E is detained under § 1225(b)(1)(B)(ii) rather than § 1225(b)(2). ECF 7 at 6. However, § 1225(b)(1)(B)(ii), which provides for detention of noncitizens who have established a credible fear following an interview, does not apply in this case because Mr. E was never given a credible fear interview. Rather, as the documents submitted by the Respondents show, Mr. E was purportedly processed under 8 U.S.C. § 1182(f) and then provided with a more limited assessment for relief under the Convention Against Torture. *See* ECF 7-1, Exh A. However, for the purpose of this petition, the Court need not decide whether Mr. E is detained under § 1225(b)(1) or § 1225(b)(2). Both subsections impose mandatory detention, and the Supreme Court and Ninth Circuit have treated both subsections interchangeably. *See Jennings*, 1238 S. Ct. at 842-43; *Rodriguez v. Marin*, 909 F.3d 252 (9th Cir. 2018).

[2] While the Respondents cite two older cases in this district which have held that the Fifth Amendment does not afford the right to a bond hearing, *see Mendoza-Linares v. Garland*, No. 21-CV-1169 BEN (AHG), 2024 WL 3316306, *2 (S.D. Cal. June 10, 2024); *Zelaya-Gonzalez v. Matuszewski*, No. 23-CV-

argument contradicts precedent decisions from the Supreme Court and Ninth Circuit. *See D.D.*, No. 25-cv-02581-BJC-JLB (slip op at 6-7) ("The Supreme Court and the Ninth Circuit have recognized that indefinite prolonged detention of an alien raises due process concerns.").

In *Kydrali*, the district court determined that the government's argument "would not be constitutionally defensible" in light of recent Supreme Court and Ninth Circuit case law. 499 F. Supp. 3d at 770. The district court quoted the Supreme Court decision in *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001), which stated:

> A statute permitting indefinite detention of an alien would raise a serious constitutional problem. The Fifth Amendment's Due Process Clause forbids the Government to deprive any person of liberty without due process of law. Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that Clause protects.

Id. at 770-71. The district court also cited to the Ninth's Circuit's decision in *Rodriguez v. Marin*, 909 F.3d 252, 257 (9th Cir. 2018), which stated as follows:

> We have grave doubts that *any statute* that allows for arbitrary prolonged detention without any process is constitutional or that those who founded our democracy precisely to protect against the government's arbitrary deprivation of liberty would have thought so. Arbitrary civil detention is not a feature of our American government. "[L]iberty is the norm, and detention prior to trial or without trial is the carefully limited exception." *United States v. Salerno*, 481 U.S. 739, 755, 107 S.Ct. 2095, 95 L.Ed.2d 697 (1987). Civil detention violates due process outside of "certain special and narrow nonpunitive circumstances." *Zadvydas v. Davis*, 533 U.S. 678, 690, 121 S.Ct. 2491, 150 L.Ed.2d 653 (2001) (internal quotation marks and citation omitted).

Rodriguez, 909 F. 3d at 256-57 (emphasis added); *Kydrali*, 499 F. Supp. 3d at 772.

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151 JLS (KSC), 2023 WL 3103811, at *3 (S.D. Cal. Apr. 25, 2023), neither of those cases considered the Supreme Court's and the Ninth Circuit's respective statements on the constitutionality of prolonged detention in *Zadvydas* and *Rodriguez*, both discussed in this section, nor did either court consider the distinctions that many courts have found to be significant in *Shaughnessy v. United States ex rel. Mezei*, 345 U.S. 206 (1953), and *Department of Homeland Security v. Thuraissigiam*, 591 U.S. 103 (2020), also discussed in this section.

Kydrali also found that the respondents' reliance on the Supreme Court's 1953 decision in *Shaughnessy v. United States ex rel. Mezei*, 345 U.S. 206, 207–09 (1953), was misplaced and distinguishable, explaining,

> *Mezei* concerned an alien who, prior to filing his habeas petition, had already been permanently excluded from the United States on security grounds. 345 U.S. at 207, 73 S.Ct. 625 ("This case concerns an alien immigrant permanently excluded from the United States on security grounds but stranded in his temporary haven on Ellis Island because other countries will not take him back."). Unlike Mr. Mezei, Petitioner is not alleged to present national security concerns, has not been permanently excluded from the United States, and seeks a bond hearing prior to a conclusive decision on his application for admission. As such, the Court finds *Mezei* inapposite. *See Rosales-Garcia v. Holland*, 322 F.3d 386, 413–14 (6th Cir. 2003) (en banc) (noting that the *Mezei* Court is limited to the national security context in which it was decided); *Lett v. Decker*, 346 F. Supp. 3d 379, 386 (S.D.N.Y. 2018) ("*Mezei* may compel the conclusion that arriving aliens already excluded on national security grounds are not entitled to a bond hearing prior to their arranged deportation. However, *Mezei* does not compel the categorical conclusion that all arriving aliens may be subject to prolonged confinement without a bond hearing.").

Kydrali, 499 F. Supp. 3d at 772; *see also Hoyos Amado*, 2025 WL 3079052, at *5 (distinguishing *Mezei*). After considering these arguments, the district court in *Kydrali* concluded, "guided by basic notions of due process gleaned from recent Supreme Court and Ninth Circuit case law, the Court joins the majority of courts across the country in concluding that an unreasonably prolonged detention under 8 U.S.C. § 1225(b) without an individualized bond hearing violates due process." 499 F. Supp. 3d at 772.

In *Gao*, the district court held likewise, concluding, "This Court agrees with the majority position that a petitioner detained under Section 1225(b)(1) may assert a due process challenge to prolonged mandatory detention without a bond hearing." 2025 WL 2770633, at *3. The district court in *Gao* distinguished the Supreme Court's decision in *Department of Homeland Security v. Thuraissigiam*, 591 U.S. 103 (2020), which the Respondents rely on in this action, as follows:

> This Court likewise agrees with those district courts that interpret *Thuraissigiam* as circumscribing an arriving alien's due process rights to *admission*, rather than limiting that person's ability to challenge *detention*. *See A.L. v. Oddo*, 761 F. Supp. 3d 822, 825 (W.D. Pa. 2025) ("Nowhere in [Thuraissigiam] did the Supreme Court suggest that arriving aliens being held under § 1225(b) may be held indefinitely and unreasonably with no due process

> implications, nor that such aliens have no due process rights whatsoever."); *Hernandez v. Wofford*, No. 25-cv-986-KES-CDB (HC), 2025 WL 2420390, at *3 (E.D. Cal. Aug. 21, 2025) ("Although the Supreme Court has described Congress's power over the 'policies and rules for exclusion of aliens' as 'plenary,' and held that this court must generally 'defer to Executive and Legislative Branch decisionmaking in that area,' it is well-established that the Due Process Clause stands as a significant constraint on the manner in which the political branches may exercise their plenary authority'—through detention or otherwise.") (citations omitted); *Padilla v. ICE*, 704 F. Supp. 3d 1163, 1171–72 (W.D. Wash. 2023) ("The holding in *Thuraissigiam* does not foreclose Plaintiffs' due process claims which seek to vindicate a right to a bond hearing with certain procedural protections.").

Gao, 2025 WL 2770633, at *3; *see also Hoyos Amado*, 2025 WL 3079052, at *4 ("The Court finds *Thuraissigiam* addressed a noncitizen's right to challenge admission, not detention.").

For the same reasons as described in *Gao*, *Kydrali*, and the other cases cited above, the Court in this instant action should reject the Respondents' contention that Mr. E has no constitutional right under the Due Process Clause against prolonged detention. Such a position would be inconsistent with Ninth Circuit's and Supreme Court's respective decisions in *Rodriguez* and *Zadvydas*, as discussed above. This Court should instead join the vast majority of district courts that have held that noncitizens who are subject to mandatory detention under § 1225(b) have a due process right against prolonged detention without a bond hearing.

2. The facts of Mr. E's case demonstrate that his detention has become prolonged in violation of the Due Process Clause.

Mr. E has been detained for over ten months with no clear end in sight while the government appeals his grant of asylum. Yet, the Respondents argue that Mr. E's detention has not become so unreasonable as to require an initial bond hearing. ECF 7 at pgs. 9-10. For reasons discussed below, the Respondents' argument misses the mark.

First, the Respondents suggest that Mr. E has not been detained long enough because petitioners in certain other cases where courts have granted relief have been detained longer. *See* ECF 7 at 9-10. However, Mr. E has been detained for nearly the exact amount of time that the petitioner in *Gao* was

detained, and the district court in that case granted relief. *See* 2025 WL 2770633, at *4-5. Indeed, the Respondents have not cited any case, in this district or otherwise, which has determined that a period of detention lasting ten months or longer was not, when considering the circumstances of the case, sufficiently prolonged to implicate the Due Process Clause. The Respondents cite to *D.D.*, but in that case the petitioner had only been detained for around seven months. *See* No. 25-cv-02581-BJC-JLB (slip op. at 7-8). The decision in *D.D.* also appears to be an anomaly; in *Hoyos*, another case within this district, the district court observed, "Courts have found detention over seven months without a bond hearing weighs toward a finding that it is unreasonable." 2025 WL 3079052, at *5 (citing *Masood v. Barr*, No. 19-CV-07623-JD, 2020 WL 95633, at *3 (N.D. Cal. Jan. 8, 2020) (nearly nine months); *Cabral v. Decker*, 331 F. Supp. 3d 255, 261 (S.D.N.Y. 2018) (over seven months); *Perez v. Decker*, No. 18-CV-5279 (VEC), 2018 WL 3991497, at *5 (S.D.N.Y. Aug. 20, 2018) (over nine months); *Brissett v. Decker*, 324 F. Supp. 3d 444, 452 (S.D.N.Y. 2018) (over nine months)); *see also Rodriguez v. Nielsen*, No.18-cv-04187-TSH, 2019 WL 7491555, at *6 (N.D. Cal. Jan. 7, 2019) ("[D]etention becomes prolonged after six months and entitles [Petitioner] to a bond hearing"). Additionally, as discussed in Mr. E's opening brief, the Supreme Court, in a variety of contexts, has expressed doubts about the constitutionality of detention without a bond hearing that lasts longer than six months. *See* ECF 2 at 7-8 (collecting cases). Accordingly, Mr. E's ten months in detention without a bond hearing must be considered a factor in his favor.

The Respondents also argue that the likely duration of detention weighs against Mr. E, however, courts within this district have repeatedly found this factor to weigh in the petitioner's favor where the petitioner's case is on appeal before the Board of Immigration Appeals ("BIA"), noting that such appeals can last months or even years. *See Hoyos Amado*, 2025 WL 3079052, at *5 ("Petitioner's future detention can last several more months or even years during the adjudication of Respondents' appeal to the BIA."); *Abdul Kadir*, 2025 WL 2932654, at *5 (same); *Gao*, 2025 WL 2770633, at *4 ("Petitioner faces an

undetermined, but likely significant, period of mandatory detention through the appeals process."); *Sibomana v. LaRose*, No.: 3:22-cv-933-LL-NLS, 2023 WL 3028093, at *4 (S.D. Cal. April 20, 2023) (noting that the appeals process "may continue for months, if not years"); *see also Banda v. McAleenan*, 385 F. Supp. 3d 1099, 1119 (W.D. Wash. 2019) (stating that the appeals process to the BIA and the Ninth Circuit "may take up to two years or longer"). In Mr. E's case, the government filed an appeal of his asylum grant to the BIA in late October 2025. *See* ECF 7.1, Ex. 16. The Respondents have not cited any case finding that the likely duration of detention weights against a petitioner in such procedural posture.

The Respondents contend that "the record does not reflect any unreasonable delays by either party in processing Petitioner's case." ECF 7 at 10. However, the Respondents have no explanation for the three government delays which Mr. E, in his opening brief, identified as unreasonable: (1) the government's delay in docketing Mr. E's court before the Immigration Court for nearly two months after he entered the U.S.; (2) the delay caused by the government's failure to complete routine background checks before the individual hearing; and (3) the government's decision to wait until the last day in the 30-day window before filing their appeal. *See* ECF 2 at 10-11. Accordingly, both delay factors weigh in Mr. E's favor.

Finally, the Respondents do not challenge Mr. E's contentions that the conditions of detention and the likelihood that proceedings will result in a final order of removal both favor Mr. E in this case. Instead, the Respondents argue that this Court should follow the three-factor balancing test from *Lopez v. Garland*, 631 F. Supp. 3d 870 (E.D. Cal. 2022), which considers the factors noted above (merging the two delay factors into a single factor) but does not consider the conditions of detention or the likelihood that proceedings will result in a final order of removal. However, multiple courts from this district have considered each of these two factors in their analysis of whether detention has become prolonged under the Due Process Clause, *see Hoyos Amado*, 2025 WL 3079052, at *5; *Gao*, 2025 WL 2770633, at *4; *Sadeqi*, 2025 WL 3154520, at *3; *Abdul Kadir*, 2025 WL 2932654, at *4; *Kydyrali*, 499 F. Supp. 3d at

773, and the Respondents have not provided any substantive reasons why this Court should not consider these factors. In particular, the fact that Mr. E remains in detention after being granted asylum by an Immigration Judge significantly distinguishes his case from other cases in this district where this issue has been litigated and strongly tips the balance of factors in his favor.

In sum, Mr. E, after being granted asylum by an Immigration Judge, has been detained in excess of ten months in poor conditions with significant delays caused by the government and no end in sight to his detention while the government appeals his asylum grant. Under such circumstances, Mr. E is likely to succeed in his claim that his detention without an individualized bond hearing has become prolonged in violation of the Due Process Clause.

C. Mr. E has shown irreparable harm from the ongoing deprivation of his constitutional rights.

As the Ninth Circuit has held, "It is well established that the deprivation of constitutional rights 'unquestionably constitutes irreparable injury.'" *Melendres v. Arpaio*, 695 F.3d 990, 1002 (9th Cir. 2012) (quoting *Elrod v. Burns*, 427 U.S. 347, 373 (1976)). As shown above, Mr. E is being subject to prolonged detention in violation of his right to due process; thus, he has "unquestionably" established irreparable injury in this case. While the Respondents claim that any alleged harm "is essentially inherent in detention,"[3] ECF 7 at 11, the Ninth Circuit has recognized in "concrete terms the irreparable harms imposed on anyone subject to immigration detention" including "subpar medical and psychiatric care in ICE detention facilities." *Hernandez v. Sessions*, 872 F.3d 976, 995 (9th Cir. 2017). The Respondents also

[3] The Respondents cite to magistrate decision from the Northern District of California, *see Lopez Reyes v. Bonnar*, No 18-cv-07429-SK, 2018 WL 747861, at *10 (N.D. Cal Dec. 24, 2018), however, the district court judge later found there was irreparable harm in that case and granted the temporary restraining order. *See Lopez Reyes v. Bonnar*, 362 F. Supp. 3d 762, 778 (N.D. Cal. 2019) ("If Petitioner can demonstrate that he is not a current danger to society, then every day he remains in custody without an opportunity to make this showing at a bond hearing causes him irreparable harm.").

fail to address any of the individualized harm that Mr. E is experiencing in detention, such as post-traumatic stress disorder and depression. *See* ECF 2 at 13. Moreover, as the Ninth Circuit has explained, "[I]t follows inexorably from our conclusion that the government's current policies are likely unconstitutional—and thus that [Petitioners] will likely be deprived of their physical liberty unconstitutionally in the absence of the injunction—that [Petitioners] have also carried their burden as to irreparable harm." *Hernandez*, 872 F.3d at 995; *see also Garcia-Vasquez*, 2025 WL 2549431, *7 (finding irreparable harm in the habeas context based on unlawful immigration detention). Thus, Mr. E has shown irreparable harm from the ongoing violation of his right to due process.

D. The balance of equities and public interest favor granting a temporary restraining order.

As Mr. E has shown a violation of his right to due process, "it would not be equitable or in the public's interest to allow [a party] . . . to violate the requirements of federal law, especially when there are no adequate remedies available." *Ariz. Dream Act Coal. v. Brewer*, 757 F.3d 1053, 1069 (9th Cir. 2014) (quoting *Valle del Sol Inc. v. Whiting*, 732 F.3d 1006, 1029 (9th Cir. 2013)). Further, "The public interest in enforcement of immigration laws, although significant, does not override the public interest in protecting the safeguards of the Constitution." *Domingo-Ros v. Archambeault*, 2025 WL 1425558, at *5 (S.D. Cal. May 18, 2025); *Garcia-Vasquez*, 2025 WL 2549431, *7. Thus, these factors also favor granting a temporary restraining order in this case.

II. CONCLUSION

For the foregoing reasons, and those stated in Mr. E.'s application for a temporary restraining order, this Court should grant Mr. E's application and enjoin the Respondents from continuing to detain Mr. E unless they provide him with an individualized bond hearing within seven days at which the government bears the burden of proof to establish by clear and convincing evidence that his detention is justified because he is either a flight risk or a danger to the community.

Respectfully submitted this 1st day of December, 2025.

By counsel,

s/ Warren Craig

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CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2025, I electronically filed the foregoing document using the CM/ECF system, which will serve counsel for the Respondents.

Dated: 12/01/2025

s/ Warren Craig

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