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14 Attorneys for Petitioner

15 **UNITED STATES DISTRICT COURT**

16 **NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

17 Yulisa ALVARADO AMBROCIO,

18 Petitioner-Plaintiff,

19 v.

20 Sergio ALBARRAN, Field Office Director of
the San Francisco Immigration and Customs
21 Enforcement Office, Kristi NOEM, Secretary
of the United States Department of Homeland
22 Security, Todd M. LYONS, Acting Director of
United States Immigration and Customs
23 Enforcement, Pamela BONDI, Attorney
General of the United States, acting in their
24 official capacities,

25 Respondents-Defendants.

Case No. 5:25-cv-10215-PCP

**AMENDED PETITION FOR WRIT OF
HABEAS CORPUS AND COMPLAINT**

INTRODUCTION

1
2 1. Petitioner-Plaintiff Yulisa Alvarado Ambrocio (“Ms. Alvarado Ambrocio” or
3 “Petitioner”) hereby files this amended habeas petition and complaint in response to the Court’s
4 Order Granting Motion to Sever, ECF 1. She filed her original pleading on September 18, 2025.¹

5 2. Yulisa Alvarado Ambrocio is a 24-year-old asylum seeker from Guatemala. She
6 came to the United States in the spring of 2024. On or about April 25, 2024, she was released from
7 the custody of Department of Homeland Security (“DHS”) officials and permitted to pursue
8 asylum in immigration court, which she did. She has since lived in San Francisco. She is the
9 mother and primary caretaker of a baby born at San Francisco General Hospital who is just shy of
10 one year and still breastfeeding. She has no criminal record anywhere in the world. She attends
11 church on Saturdays at Ministerios Cosecha in San Francisco.

12 3. Ms. Alvarado Ambrocio appeared at the San Francisco Immigration Court at 630
13 Sansome Street on September 11, 2025, for her master calendar hearing. DHS counsel made an
14 oral motion to dismiss her removal proceedings. ICE agents waited to arrest her outside of her
15 hearing. She narrowly avoided arrest because two bystander attorneys intervened on her behalf
16 and convinced ICE agents not to arrest her because she had her then-nine-month-old child with
17 her. Another hearing in Ms. Alvarado Ambrocio’s case was scheduled at the San Francisco
18 Immigration Court for October 16, 2025. The government does not dispute that she faced likely
19 arrest by ICE following that hearing. *Pablo Sequen v. Albarran*, No. 25-cv-06487-PCP, 2025 WL
20 2935630, at *3 (N.D. Cal. Oct. 15, 2025).

21 4. On October 15, 2025, this Court granted a preliminary injunction enjoining the
22 government from re-detaining Ms. Alvarado Ambrocio absent prior notice and a hearing before a
23 neutral immigration judge at which the government must demonstrate a valid basis for her
24 detention. *Id.*, at *1

25 5. The immigration judge granted DHS’s motion to dismiss Ms. Alvarado Ambrocio’s
26

27 ¹ Ms. Alvarado Ambrocio’s original pleading was part of an amended complaint in case number
28 25-cv-06487. That case number continues to relate to the litigation of the class action in which she
represents a provisionally certified class, while the case number on this filing—25-cv-10215—
relates to her severed habeas petition.

1 removal proceedings, and her appeal of that decision remains pending at the BIA.

2 6. Immigration detention is civil and thus is permissible for only two reasons: to
3 ensure a noncitizen’s appearance at immigration hearings and to prevent danger to the community.
4 But DHS does not even purport to seek to detain Ms. Alvarado Ambrocio—who demonstrably
5 poses no risk of absconding from immigration proceedings or danger to the community—for
6 either of these reasons. Instead, Respondents have argued that their actions are justified by their
7 novel reinterpretation of the immigration detention statutes. Without regard for their having
8 treated Ms. Alvarado Ambrocio as amenable to release pending her removal proceedings pursuant
9 to 8 U.S.C. § 1226(a), *see* attached Exhibit 1, Department of Homeland Security Order of Release
10 on Recognizance and Notice of Custody Determination, both dated April 25, 2024, Respondents
11 now—erroneously—claim that she is subject to mandatory detention under 8 U.S.C. § 1225(b).

12 7. Discretionary detention and release authority under 8 U.S.C. § 1226(a) is the
13 “default rule,” applicable to individuals who are “already in the country” and in removal
14 proceedings. *Jennings v. Rodriguez* 583 U.S. 281, 288-89 (2018). Certain individuals in the
15 interior are subject to well-defined exceptions that make detention mandatory—including, as
16 relevant here, if they entered the United States without admission or parole and have been arrested
17 for, charged with, or convicted of certain crimes. *See* 139 Stat. 3 (2025), codified at 8 U.S.C. §
18 1226(c)(1)(E). In contrast to the default rule of discretionary detention in the interior, Section
19 1225(b) makes available a mandatory detention scheme “at the Nation’s borders and ports of
20 entry” to detain certain noncitizens “seeking to enter the country.” *Jennings*, 583 U.S. at 287.
21 Section 1225(b)(2) provides that “in the case of an alien who is an applicant for admission, if the
22 examining immigration officer determines that an alien seeking admission is not clearly and
23 beyond a doubt entitled to be admitted, the alien shall be detained for a [full removal proceeding].”
24 8 U.S.C. § 1225(b)(2)(A). The government may release noncitizens detained under Section
25 1225(b) on temporary parole “for urgent humanitarian reasons or significant public benefit.” 8
26 U.S.C. § 1182(d)(5)(A).

27 8. Respondents now argue that Section 1225(b)(2)(A)—despite its limitation to those
28 who are “seeking admission”—mandates the re-detention of Ms. Alvarado Ambrocio, who is now

1 merely present in the interior while undergoing removal proceedings. This re-interpretation not
2 only contradicts the government’s consistent treatment of Ms. Alvarado Ambrocio as subject to
3 Section 1226, but it also is incorrect as a matter of straightforward statutory interpretation, as
4 scores of federal courts have held. *See, e.g., Pablo Sequen*, 2025 WL 2935630, at *7-10.

5 9. The psychological toll of any future arrest and confinement of Ms. Alvarado
6 Ambrocio is considerable. Every day of unlawful detention and separation from her baby would
7 add to her immiseration and subject her to irreparable harm. Moreover, detention would prejudice
8 her chance of success in her immigration proceedings, in that it undermines access to legal help
9 from the limited number of nonprofit providers who take on detained cases. Those providers are
10 already overwhelmed with demand for their services. While making it much harder to access legal
11 help, detention would also make it much harder to go through all of the steps needed to prepare an
12 asylum case – steps such as having extensive communication with counsel, collecting evidence,
13 and preparing testimony.

14 10. The Constitution protects Ms. Alvarado Ambrocio—and every other person present
15 in this country—from arbitrary deprivations of their liberty, and guarantees due process of law.
16 The government’s power over immigration is broad, but as the Supreme Court has declared, it “is
17 subject to important constitutional limitations.” *Zadvydas v. Davis*, 533 U.S. 678, 695 (2001).
18 “Freedom from bodily restraint has always been at the core of the liberty protected by the Due
19 Process Clause from arbitrary governmental action.” *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992).

20 11. Ms. Alvarado Ambrocio respectfully seeks a permanent injunction prohibiting her
21 re-arrest without a hearing to contest such re-arrest before a neutral decision-maker. In addition, to
22 preserve this Court’s jurisdiction and ensure effective relief, she also requests that this Court order
23 the government not to transfer her outside of the District, or deport her, for the duration of this
24 proceeding.

25 **JURISDICTION AND VENUE**

26 12. This Court has jurisdiction under 28 U.S.C. § 1331 (federal question jurisdiction),
27 28 U.S.C. § 2201 *et seq.* (Declaratory Judgment Act), 5 U.S.C. §§ 701–706 (Administrative
28

1 Procedure Act), Art. I, § 9, cl. 2 of the U.S. Constitution (Suspension Clause), the Fifth
2 Amendment to the U.S. Constitution, 28 U.S.C. § 1651 (All Writs Act), 28 U.S.C. § 2241 (habeas
3 corpus), and Fed. R. Civ. P. 65 (injunctive relief).

4 13. Venue is proper in the Northern District of California under 28 U.S.C. § 1391(b)(2)
5 and (e)(1) because the acts and omissions giving rise to this action occurred in this judicial district,
6 at least one Respondent resides in this district, Petitioner resides in this district, a substantial part
7 of the events or omissions giving rise to claims in this case occurred in this district, and each
8 Respondent is an officer of the United States sued in their official capacity. Venue is proper in this
9 district because it is the district with territorial jurisdiction over Respondent Albarran. *See Rasul v.*
10 *Bush*, 542 U.S. 466, 478 (2004) (holding that “because ‘the writ of habeas corpus does not act
11 upon the prisoner who seeks relief, but upon the person who holds him in what is alleged to be
12 unlawful custody,’” proper federal district is dependent on the location of the custodian); *accord*
13 *Rumsfeld v. Padilla*, 542 U.S. 426, 444-45 (2004) (holding that jurisdiction must be obtained by
14 service within the territorial jurisdiction of the district court); *id.* at 451 (explaining petition “must
15 be filed in the district court whose territorial jurisdiction includes the place where the custodian is
16 located”) (Kennedy, J., concurring).

17 **PARTIES**

18 14. Yulisa Alvarado Ambrocio is a 24-year-old asylum seeker from Guatemala and the
19 mother of a less-than-one-year-old baby who is still breastfeeding. She narrowly avoided arrest by
20 ICE after her September 11 master calendar hearing at the San Francisco Immigration and very
21 likely would have been arrested at her next hearing had it not been for a preliminary injunction
22 issued by this Court.

23 15. Respondent Sergio Albarran, sued in his official capacity, is the Field Office
24 Director for the San Francisco Enforcement and Removal Operations (“ERO”) field office. ERO is
25 a division of the U.S. office of Immigration and Customs Enforcement (“ICE”). Respondent
26 Albarran is responsible for all enforcement and removal operations in the San Francisco area.

27 16. Respondent Todd M. Lyons, sued in his official capacity, is the Acting Director of
28 ICE. As the highest-ranking officer for ICE, Respondent Lyons has authority over all policies

1 challenged in this action.

2 17. Respondent Kristi Noem, sued in her official capacity, is the Secretary of the
3 Department of Homeland Security. As the highest-ranking officer for DHS, Respondent Noem has
4 ultimate statutory authority over all of the policies challenged in this action. *See* 6 U.S.C. § 557
5 (transferring functions from the Attorney General).

6 18. Respondent Pamela Bondi is the Attorney General of the United States. She is sued
7 in her official capacity. In that capacity, Respondent Bondi is charged with overseeing the United
8 States Department of Justice (DOJ) and EOIR.

9 **LEGAL BACKGROUND**

10 19. The Constitution protects Petitioner from arbitrary deprivations of her liberty and
11 guarantees her due process of law. The government’s power over immigration is broad, but as the
12 Supreme Court has declared, it “is subject to important constitutional limitations.” *Zadvydas v.*
13 *Davis*, 533 U.S. 678, 695 (2001). “Freedom from bodily restraint has always been at the core of
14 the liberty protected by the Due Process Clause from arbitrary governmental action.” *Foucha v.*
15 *Louisiana*, 504 U.S. 71, 80 (1992).

16 20. The Constitution establishes due process rights for “all ‘persons’ within the United
17 States, including [noncitizens], whether their presence here is lawful, unlawful, temporary, or
18 permanent.” *Hernandez v. Sessions*, 872 F.3d 976, 990 (9th Cir. 2017) (quoting *Zadvydas*, 533
19 U.S. at 693). These due process rights are both substantive and procedural.

20 21. *First*, “[t]he touchstone of due process is protection of the individual against
21 arbitrary action of government,” *Wolff v. McDonnell*, 418 U.S. 539, 558 (1974), including “the
22 exercise of power without any reasonable justification in the service of a legitimate governmental
23 objective.” *Cnty. of Sacramento v. Lewis*, 523 U.S. 833, 846 (1998).

24 22. These protections extend to noncitizens facing detention, as “[i]n our society liberty
25 is the norm, and detention prior to trial or without trial is the carefully limited exception.” *United*
26 *States v. Salerno*, 481 U.S. 739, 755 (1987). Accordingly, “[f]reedom from imprisonment—from
27 government custody, detention, or other physical restraint—lies at the heart of the liberty that [the
28 Due Process] clause protects.” *Zadvydas*, 533 U.S. at 690.

1 23. Substantive due process thus requires that all forms of civil detention—including
2 immigration detention—bear a “reasonable relation” to a non-punitive purpose. *See Jackson v.*
3 *Indiana*, 406 U.S. 715, 738 (1972). The Supreme Court has recognized only two permissible non-
4 punitive purposes for immigration detention: ensuring a noncitizen’s appearance at immigration
5 proceedings and preventing danger to the community. *Zadvydas*, 533 U.S. at 690-92; *see also*
6 *Demore v. Kim*, 538 U.S. 510, 519–20, 527–28, 531 (2003).

7 24. *Second*, the procedural component of the Due Process Clause prohibits the
8 government from imposing even permissible physical restraints without adequate procedural
9 safeguards.

10 25. Generally, “the Constitution requires some kind of a hearing *before* the State
11 deprives a person of liberty or property.” *Zinerman v. Burch*, 494 U.S. 113, 127 (1990) (emphasis
12 in original). This is so even in cases where that “freedom is lawfully revocable.” *See Hurd v. D.C.,*
13 *Gov’t*, 864 F.3d 671, 683 (D.C. Cir. 2017) (citing *Young v. Harper*, 520 U.S. 143, 152 (1997) (re-
14 detention after pre-parole conditional supervision requires pre-deprivation hearing)); *Gagnon v.*
15 *Scarpelli*, 411 U.S. 778, 782 (1973) (same, in probation context); *Morrissey v. Brewer*, 408 U.S.
16 471, 484 (1972) (same, in parole context).

17 26. After an initial release from custody on conditions, even a person paroled following
18 a conviction for a criminal offense for which they may lawfully have remained incarcerated has a
19 protected liberty interest in that conditional release. *Morrissey*, 408 U.S. at 482. As the Supreme
20 Court recognized, “[t]he parolee has relied on at least an implicit promise that parole will be
21 revoked only if he fails to live up to the parole conditions.” *Id.* “By whatever name, the liberty is
22 valuable and must be seen within the protection of the [Constitution].” *Id.*

23 27. This reasoning applies with equal if not greater force to people released from civil
24 immigration detention at the border. After all, noncitizens living in the United States have a
25 protected liberty interest in their ongoing freedom from confinement. *See Zadvydas*, 533 U.S. at
26 690. And “[g]iven the civil context [of immigration detention], [the] liberty interest [of noncitizens
27 released from custody] is arguably greater than the interest of parolees.” *Ortega v. Bonnar*, 415 F.
28 Supp. 3d 963, 970 (N.D. Cal. 2019).

FACTUAL ALLEGATIONS

1
2 28. Ms. Alvarado Ambrocio fled Guatemala while she was pregnant in the face of
3 credible threats, giving rise to an asylum claim.

4 29. Shortly after Ms. Alvarado Ambrocio entered the United States, she encountered
5 immigration officials near the border. After a brief detention, she was released on her own
6 recognizance on or around April 25, 2024. In granting her release, DHS determined that she posed
7 little if any risk of flight or danger to the community. Since then, she has been living in San
8 Francisco with her partner and baby.

9 30. Ms. Alvarado Ambrocio attended a scheduled hearing at the San Francisco
10 Immigration Court on September 11, 2025. Because she did not have anyone to care for her baby,
11 she had to bring the baby with her to her court appearance. She was unrepresented.

12 31. During the hearing, DHS attorneys moved to dismiss Ms. Alvarado Ambrocio's
13 case. They provided no reason other than stating that it was "no longer in the best interest of the
14 United States Government to continue" with Ms. Alvarado Ambrocio's asylum case. The
15 immigration judge did not immediately grant the dismissal and instead gave Ms. Alvarado
16 Ambrocio ten days to file a written response. (Her case was re-calendared for October 16, 2025,
17 but in the interim the immigration judge granted dismissal.)

18 32. ICE officers were waiting outside the courtroom to arrest Ms. Alvarado Ambrocio.

19 33. Seeing that Ms. Alvarado Ambrocio had a baby with her, two lawyers who
20 happened to be nearby approached her in the courtroom and offered to speak with the ICE agents
21 before Ms. Alvarado Ambrocio entered the hall. Fearing harm to the baby, they wanted to try to
22 convince the ICE agents not to arrest her.

23 34. Eventually, the lawyers were able to get the ICE agents to agree not to arrest Ms.
24 Alvarado Ambrocio that day. Instead, they imposed monitoring requirements on her and let her
25 leave. However, the ICE agents could not say what would happen to Ms. Alvarado Ambrocio at
26 her October 16, 2025 hearing, and they declined—and Respondents have since continued to
27 decline—to provide any assurances that she would not be arrested then.

28 35. Ms. Alvarado Ambrocio faced an impossible choice: attend her next court hearing

1 and potentially face immediate arrest and separation from her baby, who is still breastfeeding, or
2 fail to appear for her hearing, receive an order of removal *in absentia*, and face deportation back to
3 the dangerous conditions that she fled in the first place.

4 36. There is no justification for ICE to stalk Ms. Alvarado Ambrocio's immigration
5 hearings and seek to arrest her. Ms. Alvarado Ambrocio was never determined to be a flight risk
6 nor a danger to the community, and her arrest and detention would not be related to either of the
7 permissible justifications for civil immigration detention.

8 37. The government has previously assessed and released Ms. Alvarado Ambrocio on
9 her own recognizance because she did not pose sufficient risk of flight or danger to the community
10 to warrant detention.

11 38. That has not changed. She has no criminal record, and there is no basis to believe
12 that she poses any public safety risk. Nor is she, having been almost arrested *while appearing in*
13 *court for her immigration case*, conceivably a flight risk. To the contrary, she has complied with
14 every requirement and court appearance that the government has asked of her.

15 39. Detention would cause Ms. Alvarado Ambrocio irreparable harm. It would greatly
16 complicate her ability to present her asylum claim, making it harder to complete all the necessary
17 steps needed to prepare an asylum case – steps such as having extensive communication with
18 counsel, collective evidence, and preparing testimony. Immigration proceedings aside, Ms.
19 Alvarado Ambrocio is terrified of what would happen to her baby's health if she cannot
20 breastfeed. As to her own health, Ms. Ambrosio fears that if she is detained, she will not get the
21 supplies she needs to keep herself clean, moisturized, and disinfected while breastfeeding. Abrupt
22 cessation of breastfeeding can cause breasts to painfully swell and for milk ducts to become
23 clogged or infected, and Ms. Ambrosio fears she will not receive the medical care she needs if she
24 is detained. Such detention would not serve any conceivable government interest, and it would
25 cause psychological and physical hardship to Ms. Ambrosio as well as serious consequences for
26 the health of her baby.

27
28

CLAIMS FOR RELIEF

FIRST CLAIM FOR RELIEF
Violation of the Fifth Amendment to the United States Constitution
(Substantive Due Process)

40. Petitioner repeats and re-alleges the allegations contained in all preceding paragraphs as if fully set forth herein.

41. The Due Process Clause of the Fifth Amendment protects all “person[s]” from deprivation of liberty “without due process of law.” U.S. Const. amend. V. “Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that [the Due Process] Clause protects.” *Zadvydas*, 533 U.S. at 690.

42. Immigration detention is constitutionally permissible only when it furthers the government’s legitimate goals of ensuring the noncitizen’s appearance during removal proceedings and preventing danger to the community. *See id.*

43. Petitioner is not a flight risk or danger to the community. Respondents’ detention of Petitioner therefore would be unjustified and unlawful. Accordingly, Petitioner is at risk of being detained in violation of the Due Process Clause of the Fifth Amendment.

44. Moreover, Petitioner’s detention would be punitive as it would bear no “reasonable relation” to any legitimate government purpose. *Id.* (finding immigration detention is civil and thus ostensibly “nonpunitive in purpose and effect”). Here, the purpose of detention appears to be “not to facilitate deportation, or to protect against risk of flight or dangerousness, but to incarcerate for other reasons”—namely, to meet newly-imposed DHS quotas. *Demore*, 538 U.S. at 532–33 (Kennedy, J., concurring).

SECOND CLAIM FOR RELIEF
Violation of the Fifth Amendment to the United States Constitution
(Procedural Due Process)

45. Petitioner repeats and re-alleges the allegations contained in all preceding paragraphs as if fully set forth herein.

46. As part of the liberty protected by the Due Process Clause, Petitioner has a weighty liberty interest in avoiding re-incarceration after her initial release from DHS custody. *See Young*,

1 520 U.S. at 146–47; *Gagnon*, 411 U.S. at 781–82; *Morrissey*, 408 U.S. at 482–83; *see also*
2 *Ortega*, 415 F. Supp. 3d at 969–70 (holding that a noncitizen has a protected liberty interest in
3 remaining out of custody following an IJ’s bond determination).

4 47. Accordingly, “[i]n the context of immigration detention, it is well-settled that due
5 process requires adequate procedural protections to ensure that the government’s asserted
6 justification for physical confinement outweighs the individual’s constitutionally protected interest
7 in avoiding physical restraint.” *Hernandez*, 872 F.3d at 990 (cleaned up); *Zinerman*, 494 U.S. at
8 127 (Generally, “the Constitution requires some kind of a hearing *before* the State deprives a
9 person of liberty or property.”) (emphasis in original). In the immigration context, for such
10 hearings to comply with due process, the government must bear the burden to demonstrate, by
11 clear and convincing evidence, that the noncitizen poses a flight risk or danger to the community.
12 *See Singh v. Holder*, 638 F.3d 1196, 1203 (9th Cir. 2011); *see also Martinez v. Clark*, 124 F.4th
13 775, 785-786 (9th Cir. 2024).

14 48. Re-detention without a pre-deprivation hearing violates due process. Respondents
15 seek to re-detain Petitioner with no notice after her prior release, with no explanation of the
16 justification for re-detention and no opportunity to contest her re-detention before a neutral
17 adjudicator before being taken into custody.

18 49. Petitioner has a profound personal interest in her liberty. Because she received no
19 procedural protections, the risk of erroneous deprivation is high, and the government has no
20 legitimate interest in detaining her without a hearing. Bond hearings are conducted as a matter of
21 course in immigration proceedings, and nothing in Petitioner’s records suggests that she would
22 abscond or endanger the community before a bond hearing could be carried out. *See, e.g., Jorge*
23 *M.F. v. Wilkinson*, No. 21-cv-01434-JST, 2021 WL 783561, at *3 (N.D. Cal. Mar. 1, 2021);
24 *Vargas v. Jennings*, No. 20-cv-5785-PJH, 2020 WL 5074312, at *3 (N.D. Cal. Aug. 23, 2020)
25 (“the government’s concern that delay in scheduling a hearing could exacerbate flight risk or
26 danger is unsubstantiated in light of petitioner’s strong family ties and his continued employment
27 during the pandemic as an essential agricultural worker”).

28

PRAYER FOR RELIEF

WHEREFORE, Petitioner requests that the Court grant the following relief:

1. Assume jurisdiction over this matter;
2. Declare that the Petitioner's arrest and detention would violate the Due Process Clause of the Fifth Amendment;
3. Enjoin Respondents from transferring Petitioner outside this District or deporting the Petitioner pending these proceedings;
4. Enjoin Respondents from re-detaining Petitioner unless her re-detention is ordered at a custody hearing before a neutral arbiter in which the government bears the burden of proving, by clear and convincing evidence, that she is a flight risk or danger to the community;
5. Award Petitioner all costs incurred in maintaining this action, including reasonable attorneys' fees under the Equal Access to Justice Act, as amended, 5 U.S.C. § 504, and on any other basis justified by law; and
6. Grant any other further relief this Court deems just and proper.

Respectfully submitted,

DATED: December 1, 2025

LAWYERS' COMMITTEE FOR CIVIL RIGHTS OF
THE SAN FRANCISCO BAY AREA

By: /s/ Jordan Wells
MARISSA HATTON
ANDREW NTIM
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Attorneys for Petitioner

DATED: December 1, 2025

CARECEN SF

By: /s/ Laura Victoria Sanchez
LAURA VICTORIA SANCHEZ
TALA BERARDI HARTSOUGH
Attorneys for Petitioner

1 DATED: December 1, 2025

AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF NORTHERN CALIFORNIA

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By: /s/ Neil K. Sawhney
NEIL K. SAWHNEY
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6 DATED: December 1, 2025

COBLENTZ PATCH DUFFY & BASS LLP

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DARIEN LO
Attorneys for Petitioner

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Verification Pursuant to 28 U.S.C. § 2242

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I am submitting this verification on behalf of Petitioner because I am her counsel in the instant habeas petition. Acting on her behalf, I hereby verify that the factual statements made in this Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

18

Dated: December 1, 2025

/s/ Jordan Wells
Jordan Wells
Attorney for Petitioner

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ATTESTATION

I, Mark L. Hejinian, am the ECF user whose identification and password are being used to file the AMENDED PETITION FOR WRIT OF HABEAS CORPUS AND COMPLAINT. In compliance with LR 5-1(i)(3), I hereby attest that all parties have concurred in this filing.

DATED: December 1, 2025

COBLENTZ PATCH DUFFY & BASS LLP

By: /s/ Mark L. Hejinian
MARK L. HEJINIAN
Attorneys for Petitioner

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