

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
WAYCROSS DIVISION

Angel Jose QUINTERO MORA,

Petitioner,

v.

WARDEN of Folkston ICE Processing Center
in their official capacity,.

Respondent.

Case No.: 5:25-cv-00190-LGW-BWC

**PETITIONER’S REPLY TO THE RESPONDENTS’ OPPOSITION TO PETITION AND
RESPONSE TO SHOW CAUSE ORDER**

Petitioner rests on the arguments made in his petition. *See* CM/ECF, Doc. 1. Petitioner agrees with Respondent’s position that the outcome in this case is controlled by this Court’s decision in *Villa v. Normand*, No. 5:25-cv-89, 2025 WL 3095969 (S.D. Ga. Nov. 4, 2025), *report and recommendation adopted*, 2025 WL 3188406 (S.D. Ga. Nov. 14, 2025). *See* CM/ECF, Doc. 4 at 2-3.

Further, as the Respondent suggests, a district court in the Central District of California has certified a class of which Petitioner is a member:

Bond Eligible Class: All noncitizens in the United States without lawful status who (1) have entered or will enter the United States without inspection; (2) were not or will not be apprehended upon arrival; and (3) are not or will not be subject to detention under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231 at the time the Department of Homeland Security makes an initial custody determination.

Maldonado Bautista v. Santacruz Jr et al., No. 5:25-cv-01873-SSS-BFM, ECF No. 82 (C.D. Cal. Nov. 25, 2025) (granting petitioner’s motion for class certification). The *Maldonado Bautista* court also held unlawful the Department of Homeland Security’s (“DHS”) policy treating all

inadmissible noncitizens arrested inside the United States as “applicants for admission” subject to mandatory detention under 8 U.S.C. § 1225(b)(2). *See Maldonado Bautista v. Santacruz Jr et al.*, No. 5:25-cv-01873-SSS-BFM, ECF No. 81 (C.D. Cal. Nov. 20, 2025) (granting petitioner’s motion for partial summary judgment). Because the *Maldonado Bautista* court certified a nationwide class of which Petitioner is a member, this Court must grant Petitioner’s habeas petition and order Respondent to consider him detained under 8 U.S.C. § 1226 and eligible for a bond hearing immediately.

Petitioner thus respectfully requests that this Court follow its previous decision in *Villa* and the class action lawsuit in *Maldonado Bautista* and grant his habeas petition so that he may pursue a bond hearing pursuant to 8 U.S.C. § 1226.

Dated: December 8, 2025

Respectfully submitted,

/s/ Thomas Evans
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