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**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Sergio Ortiz-Nunez,
Petitioner,

v.

Kristi Noem, Secretary of the United States Department of Homeland Security, in her official capacity; **Todd Lyons**, Acting of the Director of U.S. Immigration and Customs Enforcement, in his official capacity; **John Cantu**, Field Office Director for ICE's Enforcement and Removal Operation's ("ERO") Phoenix, Arizona Field Office, in his official capacity; **Sirce Owen**, Acting Director of Executive Office for Immigration Review, in her official capacity; **Luis Rosa, Jr.**, Warden of the Central Arizona Florence Correctional Complex, in his official capacity; **Respondents.**

Case No.

A No. 

**PETITION FOR WRIT OF
HABEAS CORPUS
PURSUANT TO 28 U.S.C. §
2241**

INTRODUCTION

The Respondents are unlawfully detaining Petitioner Sergio Ortiz-Nunez at Florence Correctional Center in Florence, Arizona because the Department of Homeland Security (DHS) recently changed its long-standing position with regard to mandatory detention. See, ICE Memo: Interim Guidance Regarding Detention Authority for Applications for Admission filed herewith as Exhibit 1. The Bureau of Immigration Appeals (BIA) issued a

1 precedential decision on September 5, 2025, holding that all noncitizens present in the
2 United States without admission – no matter how long they have resided here – are still
3 “applicants for admission” under 8 U.S.C. § 1225(a) and not entitled to bond hearings
4 because they are subject to mandatory detention under § 1225(b)(2)(A). See, *Matter of*
5 *Yajure Hurtado*, 29 I&N Dec. 216 (B.I.A. 2025) filed herewith as Exhibit 2.
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7 But this interpretation of the Immigration and Naturalization Act (INA) violates both
8 procedural and substantive Fifth Amendment protections, ignores the plain statutory
9 language of both § 1225 and § 1226, and is contrary to numerous recent Federal Court
10 decisions in this District that have rejected these exact arguments. See e.g. 10/3/2025
11 Order entered in *Francisco Echevarria v. Pam Bondi, et al.*, CV-25-03252-PHX-DWL
12 (ESW), (D. Ariz. 10/3/2025), filed herewith as Exhibit 3.
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14 Petitioner has been living in the United States for almost 12 ½ years, since he last
15 entered the United States in May of 2013. See, Petitioner’s Application for Asylum and for
16 Withholding of Removal, filed herewith as Exhibit 6. See, Petitioner’s Application for
17 Cancellation of Removal and Adjustment of Status filed on 9/22/2025, filed herewith as
18 Exhibit 7. He also has 3 U.S. Citizen children, all born in Phoenix, AZ. *Id.* He has no
19 criminal history. See, Petitioner’s Affidavit, filed herewith as Exhibit 4. Further, when
20 Respondents issued a Notice to Appear, it identified Petitioner as an “alien present in the
21 United States” despite “arriving alien” being an option. See, Petitioner’s Notice to Appear,
22 filed herewith as Exhibit 5.
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24 In addition to BIA decisions not being binding precedent upon this Court, the
25 Supreme Court decision last year in *Loper Bright Enterprises v. Raimondo*, 603 U.S. 369,
26 400 (2024), made clear that federal courts must independently interpret statutes and no
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1 longer defer under so-called "*Chevron* deference." This Court is therefore in the best
2 position to determine whether the Respondents are misinterpreting the relevant federal
3 statutes and improperly denying alien detainees bond hearings on the grounds that they
4 are subject to mandatory detention under § 1225(b)(2)(A). The petition for writ of habeas
5 corpus should be granted.
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7 JURISDICTION & CUSTODY

8 1. Petitioner Sergio Ortiz-Nunez is in the physical custody of Respondents
9 and Immigration and Customs Enforcement (ICE), an agency within the Department of
10 Homeland Security.

11 2. Petitioner is currently detained at the Florence Correctional Center in
12 Florence, Arizona and is under the direct control of Respondents and their agents. *See*,
13 ICE Locator Page dated 12/1/2025, filed herewith as Exhibit 7.
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15 3. This action arises under the Constitution of the United States and 8
16 U.S.C. § 1101 *et seq.*

17 4. This Court has jurisdiction under 28 U.S.C. § 2241, Art. I § 9, cl. 2 of the
18 United States Constitution, 28 U.S.C. § 1331, and the common law. This Court may
19 grant relief pursuant to 28 U.S.C. § 2241, the Declaratory Judgment Act, 28 U.S.C. §
20 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.
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22 5. Congress has preserved judicial review of challenges to immigration
23 detention. *See Jennings v. Rodriguez*, 583 U.S. 122, 130-131 (2018) (holding that 8
24 U.S.C. §§ 1226(e) and 1252(b)(9) do not bar review of challenges to prolonged
25 immigration detention).
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1 13. Respondent Todd M. Lyons is Acting Director and Senior Official
2 Performing the Duties of the Director of U.S. Immigration and Customs Enforcement
3 (“ICE”). Respondent Lyons is responsible for ICE’s policies, practices, and procedures,
4 including those relating to the detention of immigrants during their removal procedures.
5 Respondent Lyons is a legal custodian of Petitioner. Respondent Lyons is sued in his
6 official capacity.
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8 14. Respondent ICE is a federal law enforcement agency within DHS.
9 Respondent ICE is responsible for the enforcement of immigration laws, including the
10 detention and removal of immigrants. Respondent ICE is a legal custodian of Petitioner.
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12 15. Respondent John Cantu is Field Office Director for ICE’s Enforcement
13 and Removal Operation’s (“ERO”) Phoenix, Arizona Field Office. Respondent Cantu is a
14 legal custodian of Petitioner. Respondent Cantu is sued in his official capacity.
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16 16. Respondent Luis Rosa Jr. is the Warden of the Central Arizona
17 Florence Correctional Complex. Respondent Rosa is a legal custodian of Petitioner.
18 Respondent Rosa is sued in his official capacity.
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20 17. Respondent Sirce Owen is the Acting Director of the Executive Office
21 for Immigration Review (EOIR), a federal agency within the U.S. Department of Justice.
22 Respondent EOIR is responsible for the administration of immigration courts, and
23 acceptance of forms and petitions related to adjudication of immigration claims, as well
24 as motions for bond. Respondent Sirce Owen is sued in her official capacity.
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STATEMENT OF FACTS

1 18. Petitioner Sergio Ortiz-Nunez was born on  in La Campana
2 Tamazula, Mexico. See, See, Petitioner's Application for Asylum and for Withholding of
3 Removal, filed herewith as Exhibit 7.

4 19. Petitioner first entered the United States in 1999 and last entered in
5 May of 2013. *Id.*

6 20. Petitioner also has 3 U.S. Citizen children, all born in Phoenix, AZ. *Id.*

7 21. Petitioner has no criminal history. See, Petitioner's Affidavit, filed
8 herewith as Exhibit 4.

9 22. Further, when Respondents issued a Notice to Appear, it identified
10 Petitioner as an "alien present in the United States" despite "arriving alien" being an
11 option. See, Petitioner's Notice to Appear, filed herewith as Exhibit 5.

12 23. Respondents arrested Petitioner in August 2025. *Id.*

13 24. He was issued a Notice to Appear which identified him as an "alien
14 present in the United States" even though "arriving alien" was an alternate option. See,
15 Petitioner's Notice to Appear, filed herewith as Exhibit 5.

16 25. Petitioner remains detained at the Florence Correctional Center in
17 Florence, Arizona. See, Petitioner's Affidavit, filed herewith as Exhibit 4.

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21 **LEGAL FRAMEWORK**

22 26. The length of time that a petitioner has been living in the United States is
23 a constitutionally relevant consideration, because "once an alien enters the country, the
24 legal circumstance changes, for the Due Process Clause applies to all 'persons' within the
25 United States, including aliens, whether their presence here is lawful, unlawful, temporary,
26 or permanent." *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001). It is therefore reasonable to
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1 read these statutes “against [that] backdrop.” See *Hewitt v. United States*, 605 U.S. —,
2 145 S. Ct. 2165, 2173 (2025).

3 27. Due process thus requires “adequate procedural protections” to ensure
4 that the government’s asserted justification for a noncitizen’s physical confinement
5 “outweighs the individual’s constitutionally protected interest in avoiding physical
6 restraint.” *Zadvydas*, 533 U.S. at 690 (internal quotation marks omitted).

8 28. In the immigration context, the Supreme Court has recognized only two
9 valid purposes for civil detention: to mitigate the risks of danger to the community and to
10 prevent flight. *Id.*; *Demore*, 538 U.S. at 528. The government may not detain a
11 noncitizen based on any other justification.

13 29. Congress has granted the Attorney General discretion to decide
14 whether to detain or release certain noncitizens pending a removal decision. See 8
15 U.S.C. § 1226(a). The Attorney General has delegated that authority to IJs. 8 C.F.R. §§
16 1003.19, 1236.1.

17 30. On July 8, 2025, DHS adopted a new policy on mandatory detention for
18 noncitizens who have been residing in the United States. See, ICE Memo: Interim
19 Guidance Regarding Detention Authority for Applications for Admission filed herewith as
20 Exhibit 1.

22 31. On September 5, 2025, the BIA entered the precedential decision
23 *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (B.I.A. 2025), filed herewith as Exhibit 2,
24 which holds that all noncitizens who enter without inspection are “applicants for
25 admission” under 8 U.S.C. § 1225(a) and therefore subject to mandatory detention
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1 under § 1225(b)(2), without regard for the length of time they have lived in the United
2 States.

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4 32. The Ninth Circuit has held that § 1226(a) is the "default" detention statute
5 for aliens in removal proceedings "[8 U.S.C. §1226(a) ("Subsection A")] is the default
6 detention statute for noncitizens in removal proceedings and applies to noncitizens
7 "[e]xcept as provided in [Subsection C]." 8 U.S.C. § 1226(a)." *Avilez v. Garland*, 69 F. 4th
8 525, 529-530 (9th Cir. 2022). *Accord, Rodriguez Diaz v. Garland*, 83 F. 4th 1177, 1179
9 (9th Cir. 2023); *Sarr v. Scott*, 765 F. Supp. 3d 1091, 1095 (WD Wash. 2025); *Prieto-*
10 *Romero v. Clark*, 534 F.3d 1053, 1057 (9th Cir. 2008). *Casas-Castrillon v. DHS*, 535 F.3d
11 942 (9th Cir. 2008).

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13 33. On November 12, 2025, Judge William M. Conley of the Western
14 District of Wisconsin issued a 17-page order carefully examining these issues and
15 gathering cases, noting that:

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17 ...more than 45 district courts have now rejected similar arguments
18 made by respondents here and ordered bond hearings for noncitizens
19 who, like petitioner, were apprehended within the United States years
20 after entering without admission or inspection unless implicated by any
21 criminal activity covered by § 1226(c). These decisions, along with a
22 growing number of others now including this court have concluded that
23 the statutory text, the statute's history, Congressional intent, and §
24 1226(a)'s application for the past three decades support its application to
25 noncitizens in petitioner's position. (cleaned up - collecting cases in
26 footnote 6)

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28 *Quinapanta v. Bondi*, Case No. 25-cv-795-WMC (W.D. Wisc. 11/12/2025), filed herewith
as Exhibit 8.

34. In Arizona, the following cases have recently so held:

- 1 A. Order granting habeas in *Millan-Osuna v. Cantu, et al.*, Case No. 25-cv-
2 04019-MTL--JFM (D. Ariz. 11-26-25)("Respondents' view represents the
3 minority position—in the weeks since Judge Lanza considered the issue in
4 *Echevarria*, dozens of other courts have reached the same conclusion....
5 Petitioner must receive a bond hearing under 8 U.S.C. § 1226(a)."), filed with
6 the Habeas Petition as Exhibit 9.
- 7 B. Order granting habeas in *Luna-Gonzalez v. Noem, et al.*, Case No. 25-cv-
8 03794-MTL (D. Ariz. 11-26-25)("Having reviewed the recent decisions
9 adopting the minority view, the Court agrees with the conclusion reached by
10 Judge Lanza in *Echevarria*."), filed with the Habeas Petition as Exhibit 10.
- 11 C. Order granting habeas in *Najarro Zuniga v. Bondi, et al.*, Case No. 25-cv-
12 04175-SHD (D. Ariz. 11-24-25)("In the OSC, the Court observed that
13 Petitioner's case was virtually indistinguishable from Francisco Echevarria...
14 in which Judge Lanza determined individuals like Petitioner are governed by §
15 1226 and not § 1225(b)(2)(A)."), filed with the Habeas Petition as Exhibit 11.
- 16 D. Order granting habeas in *Padron-Carreron v. Noem, et al.*, Case No. 25-cv-
17 04204-DWL (D. Ariz. 11-24-25)("having carefully reviewed the recent
18 decisions adopting the minority view, the Court respectfully declines to revisit
19 the conclusion it reached in *Echevarria*."), filed with the Habeas Petition as
20 Exhibit 12.
- 21 E. Order granting habeas in *Rodriguez Plascencia v. Bondi, et al.*, Case No. 25-
22 cv-03794-MTL (D. Ariz. 11-21-25)("having carefully reviewed the recent
23 decisions adopting the minority view, the Court respectfully declines to revisit
24 the conclusion it reached in *Echevarria*."), filed with the Habeas Petition as
25 Exhibit 13.
- 26 F. Order granting habeas in *Rodrigues da Silva v. Figueroa, et al.*, Case No. 25-
27 cv-04015-PHX (D. Ariz. 11-18-25)("dozens of other district courts have
28 concluded individuals like Petitioner are subject to § 1226 and not § 1225
and, therefore, are not subject to mandatory detention"), gathering cases,
filed with the Habeas Petition as Exhibit 14.
- G. Order granting habeas in *Perez Rodriguez v. Noem, et al.*, Case No. 25-cv-
03921-PHX (D. Ariz. 11/13/2025)("the vast majority of courts concluded
individuals like Petitioner are subject to § 1226 and not § 1225 and, therefore,
are not subject to mandatory detention"), gathering cases, filed with the
Habeas Petition as Exhibit 15.
- H. Order granting habeas in *Gonzalez Rodriguez v. Bondi, et al.*, Case No. 25-cv-
03917-PHX (D. Ariz. 11-6-25)("dozens of other district courts have concluded
individuals like Petitioner are subject to § 1226 and not § 1225 and, therefore,
are not subject to mandatory detention"), gathering cases, filed with the
Habeas Petition as Exhibit 16.

- 1 I. Order granting habeas in *Abrego-Zarate v. Noem, et al.*, Case No. 25-cv-
2 03564-KML (D. Ariz. 11-6-25)(“in accord with numerous other courts
3 addressing the same issue—'Respondents' narrow focus on the language of
4 § 1225(a)(1) fails to take account of the entirety of the statutory scheme...”
5 *citing to Echevarria v. Bondi, et al.*, CV-25-03252-PHX-DWL (ESW), 2025 WL
6 2821282, at *9 (D. Ariz. October 3, 2025)), filed with the Habeas Petition as
7 Exhibit 17.
- 8 J. Order granting habeas in *Gonzalez Rodriguez-Zarate v. Bondi, et al.*, Case
9 No. 2 25-cv-03917-JJT (D. Ariz. 11-6-25)(“This Court agrees with the weight
10 of authority in determining Petitioner's detention is subject to § 1226.”), filed
11 with the Habeas Petition as Exhibit 18.
- 12 K. Order granting habeas in *Garcia-Rosales v. Noem, et al.*, No. 2:25-cv-03391-
13 SHD-DMF at page 2 (D. Ariz. Oct. 22, 2025)(“while Respondents point to two
14 district court opinions adopting their interpretation of § 1225(b)(2)(A), myriad
15 other district courts have reached the same conclusion as *Echevarria* and
16 held individuals like Petitioner are not subject to mandatory detention under
17 1225(b)(2)(A)”), filed with the Habeas Petition as Exhibit 19.
- 18 L. Order granting habeas corpus in *Benitez-Cornejo v. Cantu, et al.*, No. 2:25-cv-
19 03672 (D. Arizona Oct. 17, 2025)(“individuals like Petitioner are not “arriving
20 aliens” subject to mandatory detention but, rather, are subject tot he general
21 removal statute, 8 U.S.C. § 1226(a)”), filed with the Habeas Petition as Exhibit
22 20.
- 23 M. Order granting habeas entered in *Hector Lopez-Melo v. Bondi, et. al.*, Case
24 No. Case 2:25-cv-03394-DJH--JZB (D. Ariz. 10/9/2025)(“petitioner, who had
25 been present in the United States for years, was not an applicant for
26 admission under 1225(b)(2)(A) or subject to mandatory detention”); filed with
27 the Habeas Petition as Exhibit 21.
- 28 N. Order granting habeas corpus in *Bo Li v. Cantu, et al.*, No. CV-25-02989-PHX-
SPL (D Arizona 10/07/2025)(“Respondents maintain he is subject to
mandatory detention under 1225(b)(2). Again, Respondents are mistaken.”);
filed with the Habeas Petition as Exhibit 22.

35. In *Padron-Carreron*, the Court commented that “Respondents point to
“at least five federal courts that have joined what the government acknowledges is a
minority position on whether § 1225 applies to persons in Petitioner's position rather

1 than § 1226.”¹ The Court also mentioned four more that it was aware of.² However, it
2 concluded that “it is unsurprising that judges across the country are not in full agreement
3 on how this issue should be resolved—indeed, the Court previously emphasized that “it
4 views this issue as presenting a complicated and debatable question.” *Echevarria*, 2025
5 WL 2821282 at *5.

6
7 36. In 1997, after Congress amended the INA through the Illegal
8 Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA), EOIR and the
9 then-Immigration and Naturalization Service issued an interim rule to interpret and apply
10 IIRIRA. Specifically, under the heading of “Apprehension, Custody, and Detention of
11 Aliens,” the agencies explained that:

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13 Despite being applicants for admission, aliens who are present
14 without having been admitted or paroled (formerly referred to as
15 aliens who entered without inspection) **will be eligible** for bond
and bond redetermination.

16 62 Fed. Reg. at 10323 (emphasis added). The agencies thus made clear that individuals
17 who had entered without inspection **were** eligible for consideration for bond and bond
18 hearings before IJs under 8 U.S.C. § 1226 and its implementing regulations.

19 37. Thus, for almost 30 years, all participants in the immigration system
20 have understood that people arrested inside the United States generally fall within §
21 1226 for detention purposes and are therefore required to receive a bond hearing upon
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24 ¹ Those decisions are *Mejia Olalde v. Noem*, 2025 WL 3131942 (E.D. Mo. 2025), *Vargas Lopez v.*
25 *Trump*, 2025 WL 2780351 (D. Neb. 2025), *Chavez v. Noem*, 2025 WL 2730228 (S.D. Cal. 2025),
26 *Pipa-Aquise v. Bondi*, 2025 WL 2490657 (E.D. Va. 2025), and *Pena v. Hyde*, 2025 WL 2108913 (D.
Mass. 2025).

27 ² Those decisions are *Valencia v. Chestnut*, 2025 WL 3205133 (E.D. Cal. 2025); *Alonzo v. Noem*,
28 2025 WL 3208284 (E.D. Cal. 2025); *Sandoval v. Acuna*, 2025 WL 3048926 (W.D. La. 2025); *Rojas*
v. Olson, 2025 WL 3033967 (E.D. Wisc. 2025); *Garibay-Robledo v. Noem*, No. 1:25-CV-177-H, Doc.
9 (N.D. Tex. Oct. 24, 2025).

1 request—even if they initially entered the country without permission. *See Martinez v.*
2 *Hyde*, No. 25-11613, 2025 WL 2084238, at *4 n.9 (D. Mass. July 24, 2025) (citing the
3 United States Solicitor General’s representation to the Supreme Court at oral argument
4 that “DHS’s long-standing interpretation has been that 1226(a) applies to those who
5 have crossed the border between ports of entry and are shortly thereafter
6 apprehended”).

8 38. Despite the overwhelming number of federal cases that have ruled
9 against the government’s position, DHS and DOJ are continuing to systemically
10 misclassify people and unlawfully deny them access to bond hearings and release on
11 bond during the pendency of their immigration proceedings.

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13 **CLAIMS FOR RELIEF**
14 **FIRST CLAIM FOR RELIEF**
15 **Violation of Fifth Amendment – Substantive Due Process**

16 39. Petitioner realleges and incorporates herein the allegations contained in
17 the preceding paragraphs of the petition as if fully set forth herein.

18 40. The Due Process Clause of the Fifth Amendment forbids the
19 government from depriving any “person” of liberty “without due process of law,” including
20 noncitizens. U.S. Const. amend. V.

21 41. Substantive due process asks whether a person’s life, liberty, or
22 property is deprived without sufficient purpose. There is no question that Petitioner has
23 been deprived of his liberty in this case.

24 42. The government’s continued detention of Petitioner is not supported by
25 any special interest or compelling justification that outweighs his liberty interest.
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1 under 8 U.S.C. § 1226, and without regard to the holding of *Matter of*
2 *Yajure Hurtado*, 29 I&N Dec. 216 (B.I.A. 2025), withing three (3)
3 business days;

4 4. Award Petitioner reasonable attorneys' fees and costs pursuant to
5 the Equal Access to Justice Act, 28 U.S.C. § 2412; and

6 5. Grant any further relief the Court deems just and proper.

7 Dated this 3rd day of December 2025

8 Attorney for Respondent

9 By: /s/ Erica Sanchez
10 Erica Sanchez, Of Counsel
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VERIFICATION PURSUANT TO 28 U.S.C. § 2242

1
2 I represent Petitioner Sergio Ortiz-Nunez and submit this verification on his behalf. I
3 hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas
4 Corpus are true and correct to the best of my knowledge.
5

6
7 Dated: December 3, 2025

8 Attorney for Respondent

9 By: /s/ Erica Sanchez
10 Erica Sanchez, Of Counsel
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17 Attorney for Respondent
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LIST OF EXHIBITS

Exhibit 1.	<u>ICE Memo: Interim Guidance Regarding Detention Authority for Applications for Admission</u> (last visited September 8, 2025).
Exhibit 2.	<i>Matter of Yajure Hurtado</i> , 29 I&N Dec. 216 (B.I.A. 2025).
Exhibit 3.	10/3/2025 Order entered in <i>Francisco Echevarria v. Pam Bondi, et al.</i> , CV-25-03252-PHX-DWL (ESW), (D. Ariz. 10/3/2025)
Exhibit 4.	Petitioner's Affidavit
Exhibit 5.	Notice to Appear
Exhibit 6.	Petitioner's Application for Asylum and for Withholding of Removal
Exhibit 7.	12/1/2025 ICE Locator Page
Exhibit 8.	<i>Quinapanta v. Bondi</i> , Case No. 25-cv-795-WMC (W.D. Wisc. 11/12/2025)
Exhibit 9.	Order granting habeas in <i>Millan-Osuna v. Cantu, et al.</i> , Case No. 25-cv-04019-MTL--JFM (D. Ariz. 11-26-25)
Exhibit 10.	Order granting habeas in <i>Luna-Gonzalez v. Noem, et al.</i> , Case No. 25-cv-03794-MTL (D. Ariz. 11-26-25)
Exhibit 11.	Order granting habeas in <i>Najarro Zuniga v. Bondi, et al.</i> , Case No. 25-cv-04175-SHD (D. Ariz. 11-24-25)
Exhibit 12.	Order granting habeas in <i>Padron-Carreron v. Noem, et al.</i> , Case No. 25-cv-04204-DWL (D. Ariz. 11-24-25)
Exhibit 13.	Order granting habeas in <i>Rodriguez Plascencia v. Bondi, et al.</i> , Case No. 25-cv-03794-MTL (D. Ariz. 11-21-25)
Exhibit 14.	Order granting habeas in <i>Rodrigues da Silva v. Figueroa, et al.</i> , Case No. 25-cv-04015-PHX (D. Ariz. 11-18-25)
Exhibit 15.	Order granting habeas in <i>Perez Rodriguez v. Noem, et al.</i> , Case No. 25-cv-03921-PHX (D. Ariz. 11/13/2025)
Exhibit 16.	Order granting habeas in <i>Gonzalez Rodriguez v. Bondi, et al.</i> , Case No. 25-cv-03917-PHX (D. Ariz. 11-6-25)
Exhibit 17.	Order granting habeas in <i>Abrego-Zarate v. Noem, et al.</i> , Case No. 25-cv-03564-KML (D. Ariz. 11-6-25)
Exhibit 18.	Order entered in <i>Lopez-Cruz v. Noem, et al</i> , No. 2:25-cv-03566-DJH--ASB (D. Ariz. 11/3/2025)
Exhibit 19.	Order entered in <i>Garcia-Rosales v. Noem, et al.</i> , No. 2:25-cv-03391-SHD—DMF (D. Ariz. Oct. 22, 2025)
Exhibit 20.	Order granting habeas corpus in <i>Benitez-Cornejo v. Cantu, et al.</i> , No. 2:25-cv-03672 (D. Arizona Oct. 17, 2025)
Exhibit 21.	Order entered in <i>Hector Lopez-Melo v. Bondi, et. al.</i> , Case No. Case 2:25-cv-03394-DJH--JZB [docket no. 11] (D.C. Ariz. 10/9/2025)
Exhibit 22.	Order granting habeas corpus in <i>Bo Li v. Cantu, et al.</i> , No. CV-25-02989-PHX-SPL (D Arizona 10/07/2025)