UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

ISLOMZHON KASYMOV,
(A [redacted]

Petitioner,

v.

1. SCARLET GRANT, Warden, Cimarron Correctional Facility;

2. Samuel OLSON, Field Office Director, Chicago Field Office, Immigration and Customs Enforcement;

3. Pamela BONDI, Attorney General of the United States;

4. Kristi NOEM, Secretary of Homeland Security; and

Respondents.

Case No.

PETITION FOR WRIT OF HABEAS CORPUS AND COMPLAINT FOR EMERGENCY INJUNCTIVE RELIEF

The Petitioner, ISLOMZHON KASYMOV, by and through his own and proper person and through his attorneys, BRITTNI RIVERA, of the LAW OFFICES OF KRIEZELMAN BURTON & ASSOCIATES, LLC, petition this

Honorable Court to issue a Writ of Habeas Corpus to review his unlawful detention during his pending removal proceedings, in violation of his constitutional and statutory rights.

Introduction

1. Petitioner is presently being detained by U.S. Immigration and Customs Enforcement ("ICE") at the Cimarron Correctional Facility in Cushing, Oklahoma.
2. Petitioner is a native and citizen of Russia. He has been residing in the United States since March 2023. Petitioner is the sole financial support for his family.
3. Petitioner's detention is a substantial deprivation and burden that puts Petitioner and his family at risk without his support.
4. Petitioner's detention became unlawful on November 16, 2025, when he was taken into custody by ICE/ERO. Petitioner was detained as a weigh station during his work as a truck driver.
5. At the time of his arrest by ICE/ERO, Petitioner had a pending asylum application with the Immigration Court. He was awaiting another hearing.
6. His continued detention is an unlawful violation of due process and is in violation of the provisions of the Immigration & Nationality Act.

7. Petitioner respectfully asks this Court to issue a temporary restraining order directing Petitioner's release and enjoining Respondent's continued detention of Petitioner to ensure his due process rights and his ability to care for his family, which has needs that require Petitioner's presence and support.

8. In the alternative, Petitioner respectfully requests the Court order Respondents to show cause why this Petition should not be granted within three days. See 28 U.S.C. § 2243.

Jurisdiction and Venue

9. The action arises under the Constitution of the United States, the Immigration and Nationality Act of 1952, as amended ("INA"), 8 U.S.C. § 1101 et seq., and the Administrative Procedure Act ("APA"), 5 U.S.C. § 701 et seq.

10. This Court has habeas corpus jurisdiction pursuant to 28 U.S.C. § 2241, and Article I, section 9, clause 2 of the United States Constitution (the "Suspension Clause"), as Petitioner is presently subject to immediate detention and custody under color of authority of the United States government, and said custody is in violation of the Constitution, law or treaties of the United States.

11. This action is brought to compel the Respondents, officers of the

United States, to accord Petitioner the due process of law to which he is entitled under the Fifth and Fourteenth Amendments of the United States Constitution.

12. This Court may grant relief pursuant to 28 U.S.C. § 2241, the Declaratory Judgments Act, 28 U.S.C. § 2201 et seq., 28 U.S.C. § 1331 (federal question jurisdiction), 28 U.S.C. § 1361 (mandamus), and the All Writs Act, 28 USC § 1651.

13. Venue is proper in the Western District of Oklahoma because Petitioner is presently detained by Respondents at Cimarron Correctional Facility – which is located within the Western District. 28 U.S.C. § 1391(b), (e)(1).

Parties

14. Petitioner ISLOMZHON KASYMOV is a native and citizen of Russia. Petitioner is presently detained at Cimarron Correctional Facility located in Cushing, Oklahoma.

15. Respondent SCARLET GRANT is being sued in her official capacity only. As the Warden of Cimarron Correctional Facility, she is the custodian of the jail and all individuals detained therein, where Petitioner is presently being detained. She is, therefore, Petitioner's immediate custodian.

16. Respondent Samuel OLSON is being sued in his official capacity only, as the Field Office Director of the Chicago Field Office of ICE. As such, he is charged with the detention and removal of aliens which fall under the jurisdiction of the Chicago Field Office. He is the Department of Homeland Security's designate for all matters concerning the detention and removal of noncitizens within the Chicago Area of Responsibility.

17. Respondent PAMELA BONDI is being sued in her official capacity only, as Attorney General of the United States

18. Respondent KRISTI NOEM is being sued in her official capacity as Security of Homeland Security. In this capacity, she has ultimate responsibility for the actions of ICE. She is the legal custodian of all people detained in immigration detention facilities.

Custody

19. Petitioner ISLOMZHON KASYMOV is being unlawfully detained by ICE and he is not likely to be removed in the reasonably foreseeable future.

Factual and Procedural Background

20. Petitioner ISLOMZHON KASYMOV is a native and citizen of Russia. He has been residing in the United States since March 2023.

He is the primary financial support for his family, and works as a truck driver.

21. Petitioner entered the United States without inspection in March 2023, and has remained here since that time. He applied for asylum and withholding of removal shortly after his entry into the United States.

22. On November 16, 2025, Petitioner was engaged in his regular employment as a truck driver. He stopped at a weigh station and was arrested by ICE.

23. On September 5, 2025, the Board of Immigration Appeals ("the Board") released *Matter of Hurtado*, 29 I&N Dec. 216 (BIA 2025), taking the novel position that all noncitizens present in the United States who entered the country without a lawful entry – which would include Petitioner – must be mandatorily detained pursuant to 8 U.S.C. section 1225(b).

24. Immigration Judges are bound by precedential decisions of the Board. Therefore, filing a motion for bond redetermination would be futile, as the immigration judge is required to deny it pursuant to *Matter of Hurtado.*

25. Moreover, ICE had a longstanding practice of treating noncitizens taken into custody while living in the United States as detained

pursuant to 8 U.S.C. section 1226(a). *Rocha Rosado v. Figueroa*, 2025 WL 2337099, (D. Arizona August 11, 2025); *see Loper Bright Enter. v. Raimondo*, 603 U.S. 369, 386 (2024) ("[T]he longstanding practice of the government—like any other interpretive aid—can inform [a court's] determination of what the law is."). However, this position changed on July 8, 2025, when internal "interim guidance" was released regarding a change in their longstanding interpretation of which noncitizens are eligible for release on bond. ICE's position is that only those already admitted to the U.S. are eligible to be released from custody during their removal proceedings, and that all others are subject to mandatory detention under 8 U.S.C. § 1225, instead of 8 U.S.C. § 1226, and will remain detained with only extremely limited parole options at ICE's discretion.

26. Petitioner's continued detention, with Immigration Judge's ruling nationwide that they do not have jurisdiction over bond hearings for individuals, like Petitioner, who entered without inspection, separates him from his family, prohibits him from being able to financially provide for his family, and inhibits his removal defense in many ways, including by making it difficult to communicate with witnesses, gathering evidence, and afford legal representation, among other related harm.

27. Since the September 5, 2025 BIA decision, Petitioner does not have the opportunity to seek a request for bond redetermination on the merits and must remain detained away from his family, counsel, and support system and continues to be subjected to the aforementioned harms.

28. Because Respondent's removal proceedings will remain pending, there is little likelihood that Petitioner's removal will occur in the reasonably foreseeable future.

Legal Framework

Due Process Clause

29. "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)). "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 v. Davis*, 533 U.S. 678, 690 (2001).

30. In the immigration context, the Supreme Court only recognizes two purposes for civil detention: preventing flight and mitigating the risks of danger to the community. *Zadvydas*, 533 U.S. at 690; *Demore*, 538 U.S. at 528. A noncitizen may only be detained based on these

two justifications if they are otherwise statutorily eligible for bond. *Zadvydas*, 533 U.S. at 690.

31. "The fundamental requirement of due process is the opportunity be heard at a meaningful time and in a meaningful manner." *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976). In this case, to determine the due process to be afforded to Petitioner, the Court should consider (1) the private interest affected by the government action; (2) the risk that current procedures will cause an erroneous deprivation of that private interest, and the extent to which that risk could be reduced by additional safeguards; and (3) the government's interest in maintaining the current procedures, including the governmental function involved and the fiscal and administrative burdens that the substitute procedural requirement would entail. Id. at 335.

Detention Provisions under the Immigration and Nationality Act

32. The Immigration and Nationality Act is codified at Title 8 of the United States Code, Section 1221 *et seq.*, and controls the United States Government's authority to detain noncitizens during their removal proceedings.

33. The INA authorizes detention for noncitizens under four

distinct provisions:

1) **Discretionary Detention. 8 U.S.C. § 1226(a)** generally allows for the detention of noncitizens who are in regular, non-expedited removal proceedings; however, it permits those noncitizens who are not subject to mandatory detention to be released on bond or on their own recognizance.

2) **Mandatory Detention of "Criminal" Noncitizens. 8 U.S.C. § 1226(c)** generally requires the mandatory detention of noncitizens who are removable because of certain criminal or terrorist-related activity after they have been released from criminal incarceration.

3) **Mandatory Detention of "Applicants for Admission." 8 U.S.C. § 1225(b)** generally requires detention for certain noncitizen applicants for admission, such as those noncitizens arriving in the U.S. at a port of entry or other noncitizens who have not been admitted or paroled into the U.S. and are apprehended soon after crossing the border.

4) **Detention Following Completion of Removal Proceedings. 8 U.S.C. § 1231(a)** generally requires the detention of certain noncitizens who are subject to a final removal order during the 90-day period after the completion of removal proceedings and permits the detention of certain noncitizens beyond that period. 8 U.S.C. § 1231(a)(2), (6).

34. This case concerns the detention provisions at §§ 1226(a) and 1225(b). Both detention provisions, §§ 1226(a) and 1225(b), were enacted as part of the Illegal Immigration Reform and Immigrant Responsibility Act ("IIRIRA") of 1996, Pub. L. No. 104-–208, Div. C, §§ 302–03, 110 Stat. 3009-546, 3009–582 to 3009–583, 3009–585.[1]

[1] Section 1226(a) was most recently amended earlier this year by the Laken Riley Act, Pub. L. No.119-1, 139 Stat. 3 (2025).

35. Following enactment of the IIRIRA, the Executive Office for Immigration Review ("EOIR") drafted new regulations explaining that, in general, people who entered the country without inspection were not considered detained under § 1225(b) and that they were instead detained under § 1226(a) after an arrest warrant was issued by the Attorney General. *See* Inspection and Expedited Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal Proceedings; Asylum Procedures, 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997) ("Despite being applicants for admission, aliens who are present without having been admitted or paroled (formerly referred to as aliens who entered without inspection) ***will be eligible for bond and bond redetermination***") (emphasis added).

36. For nearly thirty years, the practice of ICE, which operates under DHS, was that most individual noncitizens that were apprehended in the interior of the United States after they had been living in the U.S. for more than two years (as opposed to "arriving" at a point of entry, border crossing, or being apprehended near the border and soon after entering without inspection) received a bond

hearing. *Rocha Rosado v. Figueroa*, 2025 WL 2337099, at *9 (D. Arizona August 11, 2025); *see Loper Bright Enter. v. Raimondo*, 603 U.S. 369, 386 (2024) ("[T]he longstanding practice of the government—like any other interpretive aid—can inform [a court's] determination of what the law is."). If determined to not be a danger to the community or a flight risk and, as a result, granted a change in custody status, the individuals were released from detention either on their own recognizance or after paying the bond amount set by the immigration judge in full. 8 U.S.C. § 1226(a)(2)(A).

37. The legislative history behind § 1226 also demonstrates that it governs noncitizens, like Petitioner, who were deemed inadmissible upon inspection at the border, released into the United States at the border after being placed into removal proceedings, and were present in the United States for a number of years prior to being taken into detention. Before passage of the Immigration Reform and Immigrant Responsibility Act ("IRIRA"), the predecessor statute to § 1226(a) governed deportation proceedings for all noncitizens arrested within the United States, and like § 1226(a), included a provision allowing for discretionary release on bond. *See* 8 U.S.C. § 1252(a)(1) (1994).[2]

[2] See 8 U.S.C. § 1252(a)(1) (1994) ("Pending a determination of deportability...any [noncitizen]...may, upon warrant of the Attorney General, be arrested and taken into custody."); *Hose v. Immigration & Naturalization Serv.*, 180

After passing the IIRIRA, Congress declared the new § 1226(a) "restates the current provisions in [the predecessor statute] regarding the authority of the Attorney General to arrest, detain, and release on bond" a noncitizen "who is not lawfully in the United States." H.R. Rep. No. 104-469, pt. 1, at 229. *See also* H.R. Rep. No. 104-828, at 210. Because noncitizens like Petitioner were entitled to discretionary detention under § 1226(a)'s predecessor statute, and Congress declared the statute's scope unchanged by IIRIRA, the Court should interpret § 1226 to allow for a discretionary release on bond for noncitizens in a situation similar to Petitioner.

38. Yet, the Board reversed course and adopted a policy of attempting to treat all individual noncitizens that were not previously admitted to the U.S. that are contacted in the interior of the U.S. at any time after their entry as "arriving" and ineligible for bond regardless of the particularities of their case. *Matter of Hurtado*, 29 I&N Dec. 216 (BIA 2025).

39. As a result, the Board has demanded that judges now ignore particularities that have been historically relevant in determining whether a noncitizen should remain or custody or be released—such

F.3d 992, 994 (9th Cir. 1999)(noting a "deportation hearing" was the "usual means" of proceeding against an alien physically in the United States).

as: when, why, or how they entered the U.S.; whether they have criminal convictions; whether they present a danger to the community or flight risk; whether they have serious medical conditions requiring ongoing care; whether U.S. citizen family members dependent upon them to provide necessary care; or, whether the noncitizen's detention is in the community's best interest.

40. The idea that a different detention scheme would apply to non-citizens 'already in the country,' as compared to those 'seeking admission into the country,' is in agreement with the core logic of our immigration system." *Martinez v. Hyde*, CV 25-11613-BEM, 2025 WL 2084238 (D. Mass. July 24, 2025) (citing *Jennings v. Rodriguez*, 583 U.S. 281, 289 (2018)); *see also Lopez Benitez v. Francis*, No. 25 CIV. 5937 (DEH), 2025 WL 2267803 (S.D.N.Y. Aug. 8, 2025) ("the Court need not reach the outer limits of the scope of the phrase 'seeking admission' in § 1225(b)—it is sufficient here to conclude that it does not reach someone who has been residing in this country for more than two years, and that as someone 'already in the country,' *Jennings*, 583 U.S. at 289, [Petitioner] may be subject to detention ***only*** as a matter of discretion under § 1226(a)") (emphasis added).

41. The government's erroneous interpretation of the INA defies the plain text of 8 U.S.C. § 1226. The government's assertion that

Petitioner is detained under § 1225 is meritless. For decades, § 1225 has applied only to noncitizens "seeking admission into the country"—i.e., new arrivals. *Jennings*, 583 U.S. at 289. This contrasts with § 1226, which applies to noncitizens "already in the country." *Id.* at 289. Petitioner has been in the United States for about twenty-five years.

42. The government's position and the Board's recent decision contravenes the plain language of the INA and its regulations and has been overwhelmingly rejected by federal courts across the nation, including in this Circuit. *See, e.g., Barcenas Garcia v. Raycraft*, No. 1:25-CV-1497, 2025 WL 3454293 (W.D. Mich. Dec. 2, 2025); *Calzada Espinosa v. Noem*, No. 1:25-CV-1396, 2025 WL 3455533 (W.D. Mich. Dec. 2, 2025); *Palmito Ordonez v. Noem*, No. 1:25-CV-1501, 2025 WL 3454296 (W.D. Mich. Dec. 2, 2025); *Ardon-Quiroz v. Assistant Field Director, Krome North Service Processing Center, U.S. Immigration and Customs Enforcement*, No. 25-CV-25290-JB, 2025 WL 3451645 (S.D. Fla. Dec. 1, 2025); *B.T.H. v. Warden, Stewart Detention Center*, No. 4:25-CV-387-CDL-AGH, 2025 WL 3455079 (M.D. Ga. Dec. 1, 2025); *E.L.D.C. v. Warden, Stewart Detention Center*, No. 4:25-CV-381-CDL-AGH, 2025 WL 3455078 (M.D. Ga. Dec. 1, 2025); *F.J.C.F. v. Warden, Stewart Detention Center*, No. 4:25-CV-359-CDL-AGH,

2025 WL 3455077 (M.D. Ga. Dec. 1, 2025); *Farias v. Noem*, No. 1:25-CV-1368, 2025 WL 3439807 (W.D. Mich. Dec. 1, 2025); *Flores Obando v. Bondi*, No. 25-6474, 2025 WL 3452047 (E.D. Pa. Dec. 1, 2025); *Martinez Correa v. Raycraft*, No. 1:25-CV-1421, 2025 WL 3442708 (W.D. Mich. Dec. 1, 2025); *Nguyen v. Parra*, No. 25-CV-25325-JB, 2025 WL 3451649 (S.D. Fla. Dec. 1, 2025); *Patel v. Hardin*, No. 2:25-CV-870-JES-NPM, 2025 WL 3442706 (M.D. Fla. Dec. 1, 2025); *Rivero v. Noem*, No. 1:25-CV-1294, 2025 WL 3438303 (W.D. Mich. Dec. 1, 2025); *Rodriguez-Acurio v. Almodovar*, No. 2:25-CV-6065 (NJC), 2025 WL 3314420 (E.D.N.Y. Nov. 28, 2025); *Barillas Resinos v. Marich*, No. 6:25-CV-6689-EAW, 2025 WL 3294720 (W.D.N.Y. Nov. 26, 2025); *Brum Texeira v. Noem*, No. 1:25-CV-13460-IT, 2025 WL 3295543 (D. Mass. Nov. 26, 2025); *Buele Morocho v. Jamison*, No. 5:25-CV-05930-JMG, 2025 WL 3296300 (E.D. Pa. Nov. 26, 2025); *C.E.R.M. v. Warden, Stewart Detention Center*, No. 4:25-CV-383-CDL-AGH, 2025 WL 3297110 (M.D. Ga. Nov. 26, 2025); *Diallo v. O'Neill*, No. CV 25-6358, 2025 WL 3298003 (E.D. Pa. Nov. 26, 2025); *Edahi v. Lewis*, No. 4:25-CV-129-RGJ, 2025 WL 3301053 (W.D. Ky. Nov. 26, 2025); *Espinoza Ruiz v. Baltazar*, No. 1:25-CV-03642-CNS, 2025 WL 3294762 (D. Colo. Nov. 26,

2025); *G.I.Z-O. v. Warden, Stewart Detention Center*, No. 4:25-CV-393-CDL-AGH, 2025 WL 3297112 (M.D. Ga. Nov. 26, 2025); *Gallegos Valenzuela v. Olson*, No. 25-CV-13499, 2025 WL 3296042 (N.D. Ill. Nov. 26, 2025); *Granados v. Noem*, No. SA-25-CA-01464-XR, 2025 WL 3296314 (W.D. Tex. Nov. 26, 2025); *Gutierrez Cabello v. Moniz*, No. 1:25-CV-13213-IT, 2025 WL 3295996 (D. Mass. Nov. 26, 2025); *Huang v. Almodovar*, No. 25 CIV. 9346 (DEH), 2025 WL 3295912 (S.D.N.Y. Nov. 26, 2025); *J.L.R.R. v. Warden, Stewart Detention Center*, No. 4:25-CV-392-CDL-AGH, 2025 WL 3297111 (M.D. Ga. Nov. 26, 2025); *Kaly Bah v. Soto*, No. 25-CV-17337-ESK, 2025 WL 3295569 (D.N.J. Nov. 26, 2025); *Lieogo v. Freden*, No. 6:25-CV-06615 EAW, 2025 WL 3290694 (W.D.N.Y. Nov. 26, 2025); *Lopez v. Raycraft*, No. 1:25-CV-1412, 2025 WL 3290655 (W.D. Mich. Nov. 26, 2025); *Martinez Diaz v. Holt*, No. CIV-25-1179-J, 2025 WL 3296310 (W.D. Okla. Nov. 26, 2025); *McDonald v. Francis*, No. 25-CV-09355 (JAV), 2025 WL 3295906 (S.D.N.Y. Nov. 26, 2025); *Mejia v. Cabezas*, No. CV 25-17094 (RK), 2025 WL 3294405 (D.N.J. Nov. 26, 2025); *Navarrete v. Noem*, No. 4:25-CV-157-DJH, 2025 WL 3298081 (W.D. Ky. Nov. 26, 2025); *Singh v. Lewis*, No. 4:25-CV-133-DJH, 2025 WL 3298080 (W.D. Ky. Nov. 26, 2025);

Barbosa Da Cunha v. Freden, No. 25-CV-6532-MAV, 2025 WL 3280575 (W.D.N.Y. Nov. 25, 2025); *Cardozo v. Noem*, No. 1:25-CV-1415, 2025 WL 3274381 (W.D. Mich. Nov. 25, 2025); *Castillo Moreno v. Noem*, No. 1:25-CV-1491, 2025 WL 3280271 (W.D. Mich. Nov. 25, 2025); *Centeno Ibarra v. Warden of the Federal Detention Center Philadelphia*, No. CV 25-6312, 2025 WL 3294726 (E.D. Pa. Nov. 25, 2025); *Contreras Perez v. Noem*, No. 3:25CV882, 2025 WL 3281774 (E.D. Va. Nov. 25, 2025); *De Jesus Aguilar v. English*, No. 3:25-CV-898 DRL-SJF, 2025 WL 3280219 (N.D. Ind. Nov. 25, 2025); *Diaz Larios v. Noem*, No. 1:25-CV-01810-AJT-WBP, 2025 WL 3285491 (E.D. Va. Nov. 25, 2025); *Garcia Pacheco v. Olson*, No. 25 C 13405, 2025 WL 3281850 (N.D. Ill. Nov. 25, 2025); *Gonzalez Lopez v. Raycraft*, No. 4:25CV2449, 2025 WL 3280344 (N.D. Ohio Nov. 25, 2025); *Hernandez-Lugo v. Bondi*, No. CV GLR-25-3434, 2025 WL 3280772 (D. Md. Nov. 25, 2025); *J.S.A. v. Warden, Stewart Detention Center*, No. 4:25-CV-380-CDL-AGH, 2025 WL 3288417 (M.D. Ga. Nov. 25, 2025); *Khabazha v. United States Immigration and Customs Enforcement*, No. 25-CV-5279 (JMF), 2025 WL 3281514 (S.D.N.Y. Nov. 25, 2025); *L.D.F. v. Warden, Stewart Detention Center*, No. 4:25-CV-374-CDL-AGH, 2025 WL

3288416 (M.D. Ga. Nov. 25, 2025); *Molina Lopez v. Lyons*, No. 1:25-CV-01838-AJT-IDD, 2025 WL 3285493 (E.D. Va. Nov. 25, 2025); *O.F.B. v. Maldonado*, No. 25-CV-6336 (HG), 2025 WL 3277677 (E.D.N.Y. Nov. 25, 2025); *Ochoa Molina v. Soto*, No. 25CV16880 (EP), 2025 WL 3281820 (D.N.J. Nov. 25, 2025); *Orellano Lopez v. Lynch*, No. 1:25-CV-1459, 2025 WL 3280262 (W.D. Mich. Nov. 25, 2025); *Rodriguez v. Hyde*, No. 25-CV-607-JJM-PAS, 2025 WL 3274606 (D.R.I. Nov. 25, 2025); *Sales Ambrocio v. Noem*, No. 4:25CV3226, 2025 WL 3295530 (D. Neb. Nov. 25, 2025); *Tenemasa-Lema v. Hyde*, No. CV 25-13029-BEM, 2025 WL 3280555 (D. Mass. Nov. 25, 2025); *Garcia-Alvarado v. Warden*, No. CV 25-16109 (SDW), 2025 WL 3268606 (D.N.J. Nov. 24, 2025); *Godoy Bermudez v. Lynch*, No. 1:25-CV-1357, 2025 WL 3264437 (W.D. Mich. Nov. 24, 2025); *Gomez v. Unknown Party*, No. CV-25-03255-PHX-JJT (CDB), 2025 WL 3269055 (D. Ariz. Nov. 24, 2025); *Huaman-Rodriguez v. Lynch*, No. 1:25-CV-1330, 2025 WL 3267768 (W.D. Mich. Nov. 24, 2025); *Hurtado-Medina v. Raycraft*, No. 25-CV-13248, 2025 WL 3268896 (E.D. Mich. Nov. 24, 2025); *Kadagan v. Raycraft*, No. 25-13602, 2025 WL 3268895 (E.D. Mich. Nov. 24, 2025); *Maya Ramirez v. Lynch*, No. 1:25-CV-1408, 2025 WL 3267771 (W.D.

Mich. Nov. 24, 2025); *Moyao Roman v. Olson*, No. CV 25-169-DLB-CJS, 2025 WL 3268403 (E.D. Ky. Nov. 24, 2025); *Quituizaca Quituisaca v. Bondi*, No. 6:25-CV-6527-EAW, 2025 WL 3264440 (W.D.N.Y. Nov. 24, 2025); *Rodriguez Quezada v. Noem*, No. 1:25-CV-1441, 2025 WL 3267784 (W.D. Mich. Nov. 24, 2025); *Romero Sanchez v. Larose*, No. 25-CV-3136 JLS (JLB), 2025 WL 3268590 (S.D. Cal. Nov. 24, 2025); *Soto-Medina v. Lynch*, No. 1:25-CV-1392, 2025 WL 3267761 (W.D. Mich. Nov. 24, 2025); *Unaucho-Castro v. Unknown Party*, No. 1:25-CV-1318, 2025 WL 3264436 (W.D. Mich. Nov. 24, 2025); *Vasquez Chinchilla v. De Anda-Ybarra*, No. EP-25-CV-00548-DB, 2025 WL 3268459 (W.D. Tex. Nov. 24, 2025); *G. G. v. Kaiser*, No. 1:25-CV-01471-KES-SAB (HC), 2025 WL 3254999 (E.D. Cal. Nov. 22, 2025); *Aguilar Ramos v. Soto*, No. CV 25-15315 (MAS), 2025 WL 3251447 (D.N.J. Nov. 21, 2025); *Carvalho Santos v. Larose*, No. 25-CV-3009-RSH-DDL, 2025 WL 3251575 (S.D. Cal. Nov. 21, 2025); *Chiapot Perez v. Noem*, No. 3:25-CV-3161-JES-VET, 2025 WL 3258065 (S.D. Cal. Nov. 21, 2025); *Cortez-Hernandez v. Noem*, No. 3:25-CV-3112-JES-DDL, 2025 WL 3258064 (S.D. Cal. Nov. 21, 2025); *Delcid v. Noem*, No. 1:25-CV-1366, 2025 WL 3251139 (W.D. Mich. Nov. 21, 2025); *Delgado Delgado v. Noem*,

No. 1:25-CV-1249, 2025 WL 3251144 (W.D. Mich. Nov. 21, 2025); *Diaz-Villatoro v. Larose*, No. 25-CV-3087 JLS (SBC), 2025 WL 3251377 (S.D. Cal. Nov. 21, 2025); *Garcia Marroquin v. Larose*, No. 25-CV-3013-RSH-AHG, 2025 WL 3251579 (S.D. Cal. Nov. 21, 2025); *Hernandez Ramos v. Hermosillo*, No. 2:25-CV-02273-TMC, 2025 WL 3251159 (W.D. Wash. Nov. 21, 2025); *Lucas-Miguel v. Larose*, No. 25-CV-3022-RSH-JLB, 2025 WL 3251580 (S.D. Cal. Nov. 21, 2025); *Paredes Padilla v. Galovich*, No. 25-CV-863-JDP, 2025 WL 3251446 (W.D. Wis. Nov. 21, 2025); *Penuela Carlos v. Bondi*, No. 9:25-CV-00249-MJT-ZJH, 2025 WL 3252561 (E.D. Tex. Nov. 21, 2025); *Petit Oropeza v. Noem*, No. 1:25-CV-1343, 2025 WL 3251140 (W.D. Mich. Nov. 21, 2025); *Plascencia v. Bondi*, No. CV-25-04140-PHX-DWL (ASB), 2025 WL 3250914 (D. Ariz. Nov. 21, 2025); *Romero Garcia v. Raycraft*, No. 25-CV-13407, 2025 WL 3252286 (E.D. Mich. Nov. 21, 2025); *Soza Velasquez v. Larose*, No. 25-CV-3137 JLS (MSB), 2025 WL 3251373 (S.D. Cal. Nov. 21, 2025); *Tellez Gomez v. Bondi*, No. C25-2248-RSM, 2025 WL 3251157 (W.D. Wash. Nov. 21, 2025); *Valerio v. Joyce*, No. CV 25-17225 (ZNQ), 2025 WL 3251445 (D.N.J. Nov. 21, 2025); *Vasquez Juarez v. Noem*, No. 5:25-CV-02972-RGK-JC, 2025 WL 3251658 (C.D. Cal. Nov. 21, 2025);

Velasquez-Gomez v. Soto, No. CV 25-17327 (BRM), 2025 WL 3251443 (D.N.J. Nov. 21, 2025); *Villa Alvarez*, No. 6:25-CV-6600-EAW, 2025 WL 3250858 (W.D.N.Y. Nov. 21, 2025); *Avalos Flores v. Noem*, No. 25-CV-03011-BAS-BLM, 2025 WL 3240807 (S.D. Cal. Nov. 20, 2025); *Betancourt Izaguirre v. Freden*, No. 25-CV-6672-EAW, 2025 WL 3246831 (W.D.N.Y. Nov. 20, 2025); *Cabrera-Cortes v. Knight*, No. 2:25-CV-01976-RFB-MDC, 2025 WL 3240971 (D. Nev. Nov. 20, 2025); *Castro Melgar v. Noem*, No. 1:25-CV-1377, 2025 WL 3240058 (W.D. Mich. Nov. 20, 2025); *Castro Sanchez v. Noem*, No. 1:25-CV-1361, 2025 WL 3237435 (W.D. Mich. Nov. 20, 2025); *Cruz Zafra v. Noem*, No. EP-25-CV-00541-DB, 2025 WL 3239526 (W.D. Tex. Nov. 20, 2025); *Duvallon Boffill v. Field Office Director, Miami Field Office*, No. 25-CV-25179-JB, 2025 WL 3246868 (S.D. Fla. Nov. 20, 2025); *Escarcega v. Olson*, No. CIV-25-1129-J, 2025 WL 3243438 (W.D. Okla. Nov. 20, 2025); *Orellana Cantarero v. Bondi*, No. 9:25-CV-00250-MJT-ZJH, 2025 WL 3252402 (E.D. Tex. Nov. 20, 2025); *Patel v. McShane*, No. CV 25-5975, 2025 WL 3241212 (E.D. Pa. Nov. 20, 2025); *Pedroso de Oliveira v. Moniz*, No. 25-CV-6663-EAW, 2025 WL 3239858 (W.D.N.Y. Nov. 20, 2025); *Rivas Alonso v. Olson*, No. 25-CV-1660, 2025 WL 3240928 (E.D. Wis. Nov. 20,

2025); *Rusu v. Noem*, No. 25 C 13819, 2025 WL 3240911 (N.D. Ill. Nov. 20, 2025); *Salinas v. Woosley*, No. 4:25-CV-121-DJH, 2025 WL 3243837 (W.D. Ky. Nov. 20, 2025); *Soto Beltran v. Raycraft*, No. 1:25-CV-1352, 2025 WL 3237429 (W.D. Mich. Nov. 20, 2025); *Sun v. Almodovar*, No. 25-CV-9262 (PKC), 2025 WL 3241268 (S.D.N.Y. Nov. 20, 2025); *Vasquez Lucero v. Soto*, No. CV 25-16737 (MCA), 2025 WL 3240895 (D.N.J. Nov. 20, 2025); *Vera Curillo v. Noem*, No. 1:25-CV-1340, 2025 WL 3235737 (W.D. Mich. Nov. 20, 2025); *Bautista v. Noem*, No. 2:25-CV-996-KCD-DNF, 2025 WL 3227482 (M.D. Fla. Nov. 19, 2025); *Ceballos Ortiz v. Raycraft*, No. 1:25-CV-1328, 2025 WL 3223771 (W.D. Mich. Nov. 19, 2025); *Cordero Esparza*, No. 1:25-CV-00601-BLW, 2025 WL 3228282 (D. Idaho Nov. 19, 2025); *Del Villar v. Noem*, No. 4:25-CV-00137-GNS, 2025 WL 3231630 (W.D. Ky. Nov. 19, 2025); *Duran Serrato v. Anderson*, No. 4:25-CV-00603-BLW, 2025 WL 3229001 (D. Idaho Nov. 19, 2025); *Elias v. Knight*, No. 1:25-CV-00594-BLW, 2025 WL 3228262 (D. Idaho Nov. 19, 2025); *Esparza Ibarra v. Knight*, No. 1:25-CV-00597-BLW, 2025 WL 3228968 (D. Idaho Nov. 19, 2025); *Estrada Elias v. Knight*, No. 1:25-CV-00604-BLW, 2025 WL 3229013 (D. Idaho Nov. 19, 2025); *Figueroa v. Hermosillo*, No.

2:25-CV-02228-TMC, 2025 WL 3230466 (W.D. Wash. Nov. 19, 2025); *Hernandez v. Bondi*, No. 1:25-CV-00615-BLW, 2025 WL 3228976 (D. Idaho Nov. 19, 2025); *Hernandez Duran v. Bernacke*, No. 2:25-CV-02105-RFB-EJY, 2025 WL 3237451 (D. Nev. Nov. 19, 2025); *Hernandez Franco v. Raycraft*, No. 1:25-CV-1274, 2025 WL 3223780 (W.D. Mich. Nov. 19, 2025); *Hernandez Gonzalez v. Olson*, No. 25 C 13439, 2025 WL 3237190 (N.D. Ill. Nov. 19, 2025); *Lucero Ortiz v. Bernacke*, No. 2:25-CV-01833-RFB-NJK, 2025 WL 3237291 (D. Nev. Nov. 19, 2025); *Mairena-Munguia v. Arnott*, No. 6:25-CV-3318-MDH, 2025 WL 3229132 (W.D. Mo. Nov. 19, 2025); *Martinez v. Unknown Party*, No. 1:25-CV-1298, 2025 WL 3223774 (W.D. Mich. Nov. 19, 2025); *Martinez Martinez v. Knight*, No. 1:25-CV-00610-BLW, 2025 WL 3228987 (D. Idaho Nov. 19, 2025); *Miguel Ramirez v. Noem*, No. 25 C 13651, 2025 WL 3227341 (N.D. Ill. Nov. 19, 2025); *Nava Ibarra v. Noem*, No. 1:25-CV-1335, 2025 WL 3223765 (W.D. Mich. Nov. 19, 2025); *Nava Lobera v. Noem*, No. 25 CV 13593, 2025 WL 3228984 (N.D. Ill. Nov. 19, 2025); *Ndiaye v. Jamison*, No. CV 25-6007, 2025 WL 3229307 (E.D. Pa. Nov. 19, 2025); *Orozco-Martinez v. Lynch*, No. 1:25-CV-1353, 2025 WL 3223786 (W.D. Mich. Nov. 19, 2025); *Ortega Casarez v. Thompson*, No.

1:25-CV-00596-BLW, 2025 WL 3228988 (D. Idaho Nov. 19, 2025); *Ortiz Gonzalez v. Knight*, No. 1:25-CV-00602-BLW, 2025 WL 3228975 (D. Idaho Nov. 19, 2025); *Perez v. Lyons*, No. 25-CV-17186-ESK, 2025 WL 3238540 (D.N.J. Nov. 19, 2025); *Perez Camacho v. Hollinshead*, No. 1:25-CV-00593-BLW, 2025 WL 3228998 (D. Idaho Nov. 19, 2025); *Perez Sales v. Mattos*, No. 2:25-CV-01819-RFB-BNW, 2025 WL 3237366 (D. Nev. Nov. 19, 2025); *Prieto-Cordova v. Larose*, No. 3:25-CV-2824-CAB-DDL, 2025 WL 3228953 (S.D. Cal. Nov. 19, 2025); *Quijada Cordoba v. Knight*, No. 1:25-CV-00605-BLW, 2025 WL 3228945 (D. Idaho Nov. 19, 2025); *Rangel v. Knight*, No. 1:25-CV-00607-BLW, 2025 WL 3229000 (D. Idaho Nov. 19, 2025); *Rodriguez Arredondo v. Hollinshead*, No. 1:25-CV-00609-BLW, 2025 WL 3228972 (D. Idaho Nov. 19, 2025); *Singh v. Andrews*, No. 1:25-CV-01543-DCJ-SCR, 2025 WL 3228139 (E.D. Cal. Nov. 19, 2025); *Solis-Becerril v. Noem*, No. 3:25-CV-3002-JES-JLB, 2025 WL 3228312 (S.D. Cal. Nov. 19, 2025); *Torres Esparza v. Hillinshead*, No. 1:25-CV-00599-BLW, 2025 WL 3228974 (D. Idaho Nov. 19, 2025); *Verdugo Lopez v. Anderson*, No. 1:25-CV-00621-BLW, 2025 WL 3228997 (D. Idaho Nov. 19, 2025); *Villafana Rodriguez v. Knight*, No. 1:25-CV-00600-BLW, 2025 WL 3228285 (D. Idaho

Nov. 19, 2025); *W.V.S.M. v. Wofford*, No. 1:25-CV-01489-KES-HBK (HC), 2025 WL 3236521 (E.D. Cal. Nov. 19, 2025); *Yac Pastor v. Raycraft*, No. 1:25-CV-1301, 2025 WL 3223777 (W.D. Mich. Nov. 19, 2025); *Y. M. v. Wofford*, No. 1:25-CV-01063-SKO (HC), 2025 WL 3228125 (E.D. Cal. Nov. 19, 2025); *Aparicio Sanchez v. Noem*, No. 25-CV-3068 JLS (MMP), 2025 WL 3214987 (S.D. Cal. Nov. 18, 2025); *Arias Torres v. Bondi*, No. 25-CV-02457-BAS-MSB, 2025 WL 3214773 (S.D. Cal. Nov. 18, 2025); *Cornejo-Mejia v. Bernacke*, No. 2:25-CV-02139-RFB-BNW, 2025 WL 3222482 (D. Nev. Nov. 18, 2025); *Demirel v. Federal Detention Center Philadelphia*, No. 25-5488, 2025 WL 3218243 (E.D. Pa. Nov. 18, 2025); *Eshdavlatov v. Arnott*, No. 6:25-CV-00844-MDH, 2025 WL 3217838 (W.D. Mo. Nov. 18, 2025); *Guzman Cardenas v. Almodovar*, No. 25-CV-9169 (JMF), 2025 WL 3215573 (S.D.N.Y. Nov. 18, 2025); *Hurtado Perez v. Olson*, No. 25 C 13731, 2025 WL 3213967 (N.D. Ill. Nov. 18, 2025); *Juarez Mendez v. Raycraft*, No. 1:25-CV-1323, 2025 WL 3214100 (W.D. Mich. Nov. 18, 2025); *Leon Hernandez v. Bondi*, No. 25-CV-1384 SEC P, 2025 WL 3217037 (W.D. La. Nov. 18, 2025); *Lojano Illescas v. Chu*, No. 25CV17273 (EP), 2025 WL 3216850 (D.N.J. Nov. 18, 2025); *Lopez v. Olson*, No. 3:25-CV-

654-DJH, 2025 WL 3217036 (W.D. Ky. Nov. 18, 2025); *Mancilla Ruiz v. Larose*, No. 25-CV-02714-BAS-SBC, 2025 WL 3214975 (S.D. Cal. Nov. 18, 2025); *Morales Rodriguez v. Arnott*, No. 6:25-CV-00836-MDH, 2025 WL 3218553 (W.D. Mo. Nov. 18, 2025); *Rodriguez Cortina v. Anda-Ybarra*, No. EP-25-CV-00523-DB, 2025 WL 3218682 (W.D. Tex. Nov. 18, 2025); *Sarmiento Guerrero v. Noem*, No. 25-CV-5881 (EK), 2025 WL 3214787 (E.D.N.Y. Nov. 18, 2025); *Villegas ex rel. Guzman Andujar v. Francis*, No. 1:25-CV-09199 (JLR), 2025 WL 3215597 (S.D.N.Y. Nov. 18, 2025); *Alarcon v. Moniz*, No. 1:25-CV-13294-IT, 2025 WL 3204553 (D. Mass. Nov. 17, 2025); *Amigon Cardona v. Unknown Party #1*, No. 1:25-CV-1287, 2025 WL 3200682 (W.D. Mich. Nov. 17, 2025); *Corrales Castillo v. Wamsley*, No. 2:25-CV-02172-TMC, 2025 WL 3204370 (W.D. Wash. Nov. 17, 2025); *Escobar Salgado v. Mattos*, No. 2:25-CV-01872-RFB-EJY, 2025 WL 3205356 (D. Nev. Nov. 17, 2025); *Faizyan v. Casey*, No. 3:25-CV-02884-RBM-JLB, 2025 WL 3208844 (S.D. Cal. Nov. 17, 2025); *Garcia Sandoval v. Rokosky*, No. CV 25-17229 (SDW), 2025 WL 3204746 (D.N.J. Nov. 17, 2025); *Hernandez Balderas v. Olson*, No. 25 C 12749, 2025 WL 3210422 (N.D. Ill. Nov. 17, 2025); *Martinez Guerra v. Noem*, No. 1:25-CV-1341, 2025 WL

3204289 (W.D. Mich. Nov. 17, 2025); *Mora Lara v. Olson*, No. 25 C 13110, 2025 WL 3210403 (N.D. Ill. Nov. 17, 2025); *Oliveros Alvarez v. Olson*, No. 25 C 13410, 2025 WL 3210461 (N.D. Ill. Nov. 17, 2025); *Orellana v. Noem*, No. 1:25-CV-1333, 2025 WL 3198685 (W.D. Mich. Nov. 17, 2025); *Quishpe-Guaman v. Noem*, No. 4:25-CV-00211-TWP-KMB, 2025 WL 3201072 (S.D. Ind. Nov. 17, 2025); *Rafael v. Plymouth County Correctional Facility*, No. 1:25-CV-13197-IT, 2025 WL 3204554 (D. Mass. Nov. 17, 2025); *Reza Ayala v. Olson*, No. 25 C 13317, 2025 WL 3210398 (N.D. Ill. Nov. 17, 2025); *Robledo Gonzalez v. Raycraft*, No. 25-13502, 2025 WL 3218242 (E.D. Mich. Nov. 17, 2025); *Ruiz Garcia v. Olson*, No. 25 C 13621, 2025 WL 3210425 (N.D. Ill. Nov. 17, 2025); *Salazar Aguilar v. Noem*, No. 25 C 12731, 2025 WL 3204568 (N.D. Ill. Nov. 17, 2025); *Sevilla v. Noem*, No. 1:25-CV-1325, 2025 WL 3200698 (W.D. Mich. Nov. 17, 2025); *Soto-Garcia v. Olson*, No. 25-CV-13736, 2025 WL 3204594 (N.D. Ill. Nov. 17, 2025); *Yupangui v. Hale*, No. 2:25-CV-884, 2025 WL 3207070 (D. Vt. Nov. 17, 2025); *Solano Morillo v. Albarran*, No. 1:25-CV-01533-DJC-AC, 2025 WL 3190899 (E.D. Cal. Nov. 15, 2025); *Batz Barreno v. Baltasar*, No. 025-CV-03017-GPG-TPO, 2025 WL 3190936 (D. Colo. Nov. 14, 2025); *Chavez v. Director of*

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v. O'Neill, No. 25-CV-6338, 2025 WL 3171639 (E.D. Pa. Nov. 13, 2025); *Delgado Avila v. Crowley*, No. 2:25-CV-00533-MPB-MJD, 2025 WL 3171175 (S.D. Ind. Nov. 13, 2025); *Ginez Hernandez v. Noem*, No. 1:25-CV-1307, 2025 WL 3170872 (W.D. Mich. Nov. 13, 2025); *Lara v. Noem*, No. 1:25-CV-1332, 2025 WL 3170876 (W.D. Mich. Nov. 13, 2025); *Madrid Gonzalez v. Noem*, No. 1:25-CV-1315, 2025 WL 3170879 (W.D. Mich. Nov. 13, 2025); *Mariscal Serrano v. Salazar*, No. 25 C 13170, 2025 WL 3171354 (N.D. Ill. Nov. 13, 2025); *Moreira Da Silva v. LaForge*, No. 25CV17095 (EP), 2025 WL 3173859 (D.N.J. Nov. 13, 2025); *Rueda Torres v. Francis*, No. 25 CIV. 8408 (DEH), 2025 WL 3168759 (S.D.N.Y. Nov. 13, 2025); *Singh v. Noem*, No. 1:25-CV-1251, 2025 WL 3170855 (W.D. Mich. Nov. 13, 2025); *Bernardo Aquino v. Larose*, No. 25-CV-2904-RSH-MMP, 2025 WL 3158676 (S.D. Cal. Nov. 12, 2025); *Chilel Chilel v. Sheehan*, No. 25-CV-3975 (SRN/DTS), 2025 WL 3157839 (D. Minn. Nov. 12, 2025); *Contreras Alvarez v. Noem*, No. 1:25-CV-1313, 2025 WL 3151948 (W.D. Mich. Nov. 12, 2025); *Diallo v. Maldonado, Jr.*, No. 25-CV-05740 (DG), 2025 WL 3158295 (E.D.N.Y. Nov. 12, 2025); *Diego v. Raycraft*, No. 25-13288, 2025 WL 3159106 (E.D. Mich. Nov. 12, 2025); *E.M. v. Noem*, No. 25-CV-3975 (SRN/DTS), 2025

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(W.D. Wash. Nov. 10, 2025); *Sumba v. Crowley*, No. 1:25-CV-13034, 2025 WL 3126512 (N.D. Ill. Nov. 9, 2025); *E.V. v. Raycraft*, No. 4:25-CV-2069, 2025 WL 3122837 (N.D. Ohio Nov. 7, 2025); *Garcia Rios v. Noem*, No. 25-CV-13180, 2025 WL 3124173 (N.D. Ill. Nov. 7, 2025); *Hernandez Garcia v. Raycraft*, No. 1:25-CV-1281, 2025 WL 3122800 (W.D. Mich. Nov. 7, 2025); *Molina Ochoa v. Noem*, No. 1:25-CV-00881-JB-LF, 2025 WL 3125846 (D.N.M. Nov. 7, 2025); *Morales-Martinez v. Raycraft*, No. 25-CV-13303, 2025 WL 3124695 (E.D. Mich. Nov. 7, 2025); *Munoz Arredondo v. Olson*, No. 25-CV-12882, 2025 WL 3124149 (N.D. Ill. Nov. 7, 2025); *Rodriguez Serrano v. Noem*, No. 1:25-CV-1320, 2025 WL 3122825 (W.D. Mich. Nov. 7, 2025); *Vasquez Carcamo v. Noem*, No. 2:25-CV-00922-SPC-NPM, 2025 WL 3119263 (M.D. Fla. Nov. 7, 2025); *Diaz Garcia v. Noem*, No. 1:25-CV-1712 (PTG/LRV), 2025 WL 3111223 (E.D. Va. Nov. 6, 2025); *Mirzoev v. Olson*, No. 25-CV-12969, 2025 WL 3101969 (N.D. Ill. Nov. 6, 2025); *Pacheco Carrillo v. Noem*, No. 25 C 12963, 2025 WL 3101993 (N.D. Ill. Nov. 6, 2025); *Perez v. Francis*, No. 25-CV-8112 (JGK), 2025 WL 3110459 (S.D.N.Y. Nov. 6, 2025); *Sanchez Guzman v. Noem*, 1:25-cv-13415 (N.D. Ill. Nov. 6, 2025); *Vicens-Marquez v. Soto*, No. CV 25-16906

(KSH), 2025 WL 3097496 (D.N.J. Nov. 6, 2025); *Arizmendi v. Noem*, No. 25 C 13041, 2025 WL 3089107 (N.D. Ill. Nov. 5, 2025); *Hernandez Capote v. Sec'y U.S. Dep't of Homeland Sec.*, No. 25-13128, 2025 WL 3089756 (E.D. Mich. Nov. 5, 2025); *Lopez Sarmiento v. Perry*, No. 1:25-CV-01644-AJT-WBP, 2025 WL 3091140 (E.D. Va. Nov. 5, 2025); *Romero Lopez v. Noem*, No. CV 25-16890 (SDW), 2025 WL 3101889 (D.N.J. Nov. 5, 2025); *Alonso v. Tindall*, No. 3:25-CV-652-DJH, 2025 WL 3083920 (W.D. Ky. Nov. 4, 2025); *Alvarez Ortiz v. Freden*, No. 25-CV-960-LJV, 2025 WL 3085032 (W.D.N.Y. Nov. 4, 2025); *Salgado Mendoza v. Noem*, No. 1:25-CV-1252, 2025 WL 3077589 (W.D. Mich. Nov. 4, 2025); *Tumba Huamani v. Francis*, No. 25-CV-8110 (LJL), 2025 WL 3079014 (S.D.N.Y. Nov. 4, 2025); *D.E.C.T. v. Noem*, No. 25 C 12463, 2025 WL 3063650 (N.D. Ill. Nov. 3, 2025); *Flores v. Olson*, No. 25 C 12916, 2025 WL 3063540 (N.D. Ill. Nov. 3, 2025); *Galvis Cortes v. Olsen*, No. 25 C 6293, 2025 WL 3063636 (N.D. Ill. Nov. 3, 2025); *Magallanes Sanchez v. Olson*, Case No. 25-cv-13226 (N.D. Ill. Nov. 3, 2025); *Vargas Ramos v. Rokosky*, No. 25CV15892 (EP), 2025 WL 3063588 (D.N.J. Nov. 3, 2025); *J.A.M. v. Streeval*, No. 4:25-CV-342 (CDL), 2025 WL 3050094 (M.D. Ga. Nov. 1, 2025); *Artola Arauz*

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12, 2025); *Carlon v. Kramer*, No. 4:25CV3178, 2025 WL 2624386 (D. Neb. Sept. 11, 2025); *Lopez Santos v. Noem*, No. 3:25-CV-01193, 2025 WL 2642278 (W.D. La. Sept. 11, 2025); *Palma v. Trump*, No. 4:25CV3176, 2025 WL 2624385 (D. Neb. Sept. 11, 2025); *Perez v. Kramer*, No. 4:25CV3179, 2025 WL 2624387 (D. Neb. Sept. 11, 2025); *Hernandez Marcelo v. Trump*, No. 3:25-CV-00094-RGE-WPK, 2025 WL 2741230 (S.D. Iowa Sept. 10, 2025); *Guzman v. Andrews*, No. 1:25-CV-01015-KES-SKO (HC), 2025 WL 2617256 (E.D. Cal. Sept. 9, 2025); *Hinestroza v. Kaiser*, No. 25-CV-07559-JD, 2025 WL 2606983 (N.D. Cal. Sept. 9, 2025); *Pizarro Reyes v. Raycraft*, No. 25-CV-12546, 2025 WL 2609425 (E.D. Mich. Sept. 9, 2025); *Sampiao v. Hyde*, No. 1:25-CV-11981-JEK, 2025 WL 2607924 (D. Mass. Sept. 9, 2025); *Jimenez v. FCI Berlin, Warden*, No. 25-CV-326-LM-AJ, 2025 WL 2639390 (D.N.H. Sept. 8, 2025); *Martinez v. Noem*, No. 5:25-CV-01007-JKP, 2025 WL 2598379 (W.D. Tex. Sept. 8, 2025) (finding section 1225 does not apply); *Mosqueda v. Noem*, No. 5:25-CV-02304 CAS (BFM), 2025 WL 2591530 (C.D. Cal. Sept. 8, 2025); *Doe v. Moniz*, No. 1:25-CV-12094-IT, 2025 WL 2576819 (D. Mass. Sept. 5, 2025); *Herrera v. Knight*, No. 2:25-CV-01366-RFB-DJA, 2025 WL 2581792 (D. Nev. Sept. 5, 2025); *Carmona-*

Lorenzo v. Trump, No. 4:25CV3172, 2025 WL 2531521 (D. Neb. Sept. 3, 2025); *Fernandez v. Lyons*, No. 8:25CV506, 2025 WL 2531539 (D. Neb. Sept. 3, 2025); *Garcia v. Noem*, No. 25-CV-02180-DMS-MMP, 2025 WL 2549431 (S.D. Cal. Sept. 3, 2025); *Hernandez Nieves v. Kaiser*, No. 25-CV-06921-LB, 2025 WL 2533110 (N.D. Cal. Sept. 3, 2025); *Perez v. Berg*, No. 8:25CV494, 2025 WL 2531566 (D. Neb. Sept. 3, 2025); *Lopez-Campos v. Raycraft*, No. 2:25-CV-12486, 2025 WL 2496379 (E.D. Mich. Aug. 29, 2025); *Tiburcio Garcia v. Bondi*, 25-CV-03219 (D. Minn. Aug. 29, 2025); *Jose J.O.E. v. Bondi*, No. 25-CV-3051 (ECT/DJF), 2025 WL 2466670 (D. Minn. Aug. 27, 2025); *Kostak v. Trump*, No. CV 3:25-1093, 2025 WL 2472136 (W.D. La. Aug. 27, 2025); *Leal-Hernandez v. Noem*, No. 1:25-CV-02428-JRR, 2025 WL 2430025 (D. Md. Aug. 24, 2025); *Aguilar Vazquez v. Bondi*, 25-cv-03162 (D. Minn. Aug 19, 2025); *Jacinto v. Trump*, No. 4:25CV3161, 2025 WL 2402271 (D. Neb. Aug. 19, 2025); *Romero v. Hyde*, No. CV 25-11631-BEM, 2025 WL 2403827 (D. Mass. Aug. 19, 2025); *Samb v. Joyce*, No. 25 CIV. 6373 (DEH), 2025 WL 2398831 (S.D.N.Y. Aug. 19, 2025); *Ferrera Bejarano v. Bondi*, 25-cv-03236 (D. Minn. Aug 18, 2025); *Arrazola-Gonzalez v. Noem*, No. 5:25-CV-01789-ODW (DFMX), 2025 WL 2379285

(C.D. Cal. Aug. 15, 2025); *Maldonado v. Olson*, No. 25-CV-3142 (SRN/SGE), 2025 WL 2374411 (D. Minn. Aug. 15, 2025); *Anicasio v. Kramer*, No. 4:25CV3158, 2025 WL 2374224 (D. Neb. Aug. 14, 2025); *dos Santos v. Noem*, No. 1:25-CV-12052-JEK, 2025 WL 2370988 (D. Mass. Aug. 14, 2025); *Garcia Jimenez v. Kramer*, No. 4:25CV3162, 2025 WL 2374223 (D. Neb. Aug. 14, 2025); *Lopez Benitez v. Francis*, No. 25 CIV. 5937 (DEH), 2025 WL 2371588 (S.D.N.Y. Aug. 13, 2025); *Rosado v. Figueroa*, No. CV 25-02157 PHX DLR (CDB), 2025 WL 2337099 (D. Ariz. Aug. 11, 2025); *Martinez v. Hyde*, No. CV 25-11613-BEM, 2025 WL 2084238 (D. Mass. July 24, 2025); *Gomes v. Hyde*, No. 1:25-CV-11571-JEK, 2025 WL 1869299 (D. Mass. July 7, 2025); *Aditya W.H. v. Trump*, 782 F. Supp. 3d 691 (D. Minn. 2025); *Rodriguez v. Bostock*, 779 F. Supp. 3d 1239 (W.D. Wash. 2025); *see also* Inspection and Expedited Removal of Aliens, 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997) (explaining that "[d]espite being applicants for admission, aliens who are present without having been admitted or paroled (formerly referred to as aliens who entered without inspection) will be eligible for bond and bond redetermination").

43. An overwhelming majority of Article III courts that have

examined how the relevant provisions of the INA apply ... has reached the exact same answer," uniformly finding that detention is subject to the provisions of § 1226(a), not the "mandatory" provisions of § 1225(b) as Respondents claim. *Hyppolite*, 2025 WL 2829511 at *7.

44. Courts do not defer to any agency interpretation of law just because it is ambiguous. *Lopez Bright Enter. v. Raimando*, 603 U.S. 369, 412-413 (2024).

45. This Respondents' new interpretation is inconsistent with the plain language of the INA. First, the government disregards a key phrase in § 1225. "[I]n the case of an alien who is an applicant for admission, if the examining immigration officer determines that an alien ***seeking admission*** is not clearly and beyond a doubt entitled to be admitted, the alien shall be detained for a proceeding under section 1229a[.]" 8 U.S.C. § 1225(b)(2)(A) (emphasis added). In other words, mandatory detention applies when "the individual is: (1) an 'applicant for admission'; (2) 'seeking admission'; and (3) 'not clearly and beyond a doubt entitled to be admitted.'" *Martinez*, 2025 WL 2084238, at *2.

46. The "seeking admission" language "necessarily implies some sort of present tense action." *Alejandro*, 2025 WL 2896348, at *15; *Martinez*, 2025 WL 2084238, at *6; *see also Matter of M- D-C-V-*, 28 I. & N. Dec. 18, 23 (B.I.A. 2020) ("The use of the present progressive

tense 'arriving,' rather than the past tense 'arrived,' implies some temporal or geographic limit . . . ."); *U.S. v. Wilson*, 503 U.S. 329, 333 (1992) ("Congress' use of verb tense is significant in construing statutes.")

47. In other words, the plain language of § 1225 applies to immigrants currently seeking admission into the United States at the nation's border or another point of entry. It does not apply to noncitizens "already present in the United States"—only § 1226 applies in those cases. *See Jennings*, 583 U.S. at 303; *see also Romero v. Hyde*, 25-11631-BEM, 2025 WL 2403827 at *9-10 (D. Mass Aug. 19, 2025).

48. When interpreting a statute, "every clause and word . . . should have meaning." *United States ex rel. Polansky, M.D. v. Exec. Health Res., Inc.*, 599 U.S. 419, 432 (2023) (internal quotation marks and citation omitted), and this includes the title. *Yates v. United States*, 574 U.S. 528, 552 (Alito, J., concurring in judgment). And "the words of the statute must be read in their context and with a view to their place in the overall statutory scheme." *Gundy v. United States*, 588 U.S. 128, 141 (2019) (quotation omitted). The added word of "arriving" in the title "indicates that the statute governs 'arriving noncitizens, not those present already." *Beltran Barrera*, 2025 WL 2690565, at *6;

Pizarro Reyes, 2025 WL 2609425, at *5. This is further supported by the text, which focusses on noncitizens who arrive as "crewmen" and "stowaways." *Id.*; *Alejandro*, 2025 WL 2896348, at *16-17. The government's position requires the Court to ignore critical provisions of the INA.

49. The government's interpretation also renders portions of the newly enacted provisions of the INA superfluous. "When Congress amends legislation, courts must presume it intends its amendment to have real and substantial effect." *Van Buren v. United States*, 593 U.S. 374, 393 (2021). Congress passed the Laken Riley Act (the "Act") in January 2025. The Act amended several provisions of the INA, including §§ 1225 and 1226. Laken Riley Act, Pub. L. No. 119-1, 139 Stat. 3 (2025). Relevant here, the Act added a new category of noncitizens subject to mandatory detention under § 1226(c)—those already present in the United States who have also been arrested, charged with, or convicted of certain crimes. 8 U.S.C. § 1226(c)(1)(E); 8 U.S.C. § 1182(a)(6)(A). Of course, under the government's position, these individuals are already subject to mandatory detention under § 1225—rendering the amendment redundant. Likewise, mandatory-detention exceptions under § 1226(c) are meaningful only if there is a default of discretionary detention—and there is, under § 1226(a). *See*

Rodriguez, 2025 WL 1193850, at *12; *see also Beltran Barrera*, 2025 WL 2690565, at *7; *Alejandro*, 2025 WL 2896348, at *17-18.

50. Additionally, "[w]hen Congress adopts a new law against the backdrop of a longstanding administrative construction, the court generally presumes that the new provision works in harmony with what came before." *Monsalvo v. Bondi*, 604 U.S. __, 145 S. Ct. 1232, 1242 (2025). Congress adopted the Act against the backdrop of decades of agency practice applying § 1226(a) to immigrants like Petitioner, who are present in the United States but have not been admitted or paroled. *Rodriguez*, 2025 WL 1193850, at *15; *Martinez*, 2025 WL 2084238, at *4; 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997) ("Despite being applicants for admission, aliens who are present without having been admitted or paroled . . . will be eligible for bond and bond redetermination.").

51. Section 1226(a) applies by default to all persons "pending a decision on whether the [noncitizen] is to be removed from the United States." Removal hearings for noncitizens under 1226(a) are held under § 1229a, which "decid[e] the inadmissibility or deportability of a[] [noncitizen]." By contrast, § 1225(b) applies to people arriving at U.S. ports of entry or who recently entered the United States.

52. Accordingly, the mandatory detention provision of § 1225(b)(2)

does not apply to Petitioner.

53. Given the Board's precedential decision in *Hurtado*, any Motion for Bond Redetermination would be futile. Petitioner has no way to seek relief from the judge's and Board's decision but through a habeas petition in the federal courts.

Claims for Relief

FIRST CAUSE OF ACTION

Violation of the Immigration and Nationality Act

54. Petitioner repeats and incorporates by reference all allegations above as though fully set forth fully herein.

55. Petitioner was detained pursuant to authority contained in section 1226. He is not subject mandatory detention pursuant to section 1225(b)(2).

56. The mandatory detention provision at 8 U.S.C. § 1225(b)(2) does not apply to all noncitizens residing in the United States who are subject to the grounds of inadmissibility. Mandatory detention does not apply to those who previously entered the country and have been residing in the United States prior to being apprehended and placed in removal proceedings by Respondents. Such noncitizens are detained under § 1226(a) and are eligible for release on bond, unless

they are subject to § 1225(b)(1), § 1226(c), or § 1231.

57. The Board wrongfully decided *Matter of Hurtado*, finding all noncitizens, such as Petitioner, are subject to mandatory detention under § 1225(b)(2), and this Court is not bound by the decision.

55. The unlawful application of § 1225(b)(2) to Petitioner violates the INA.

SECOND CAUSE OF ACTION

Violation of the Due Process Clause of the Fifth Amendment of the United States Constitution

58. Petitioner repeats and incorporates by reference all allegations above as though set forth fully herein.

59. The Due Process Clause asks whether the government's deprivation of a person's life, liberty, or property is justified by a sufficient purpose. Here, there is no question that the government has deprived Petitioner of his liberty.

60. The government's detention of Petitioner is unjustified. Respondents have not demonstrated that Petitioner needs to be detained. *See Zadvydas*, 533 U.S. at 690 (finding immigration detention must further the twin goals of (1) ensuring the noncitizen's appearance during removal proceedings and (2) preventing danger to

the community). There is no finding that Petitioner cannot be safely released back to his community and family.

61. The *Matter of Hurtado* decision wrongly interprets the Immigration and Nationality Act.

62. This Court is not required to give deference to *Matter of Hurtado*. In *Loper Bright*, the Supreme Court was clear that "[c]ourts must exercise their independent judgment in deciding whether an agency has acted within its statutory authority," and indeed "may not defer to an agency interpretation of the law simply because a statute is ambiguous." *Loper Bright Enters. v. Raimondo*, 603 U.S. 369, 412 (2024).

63. Rather, this Court can simply look to the Supreme Court's own words in *Jennings* that held that for decades, § 1225 has applied only to noncitizens "seeking admission into the country"—i.e., new arrivals, and that this contrasts with § 1226, which applies to noncitizens "already in the country." *Jennings v. Rodriguez*, 583 U.S. 281, 289 (2018). By keeping Petitioner detained today, his detention is unconstitutional as applied to him and in violation of his due process rights.

64. For these reasons, Petitioner's detention violates the Due Process Clause of the Fifth Amendment.

65. Petitioner therefore requests immediate release, or, in the alternative, a bond hearing within five days, where the burden is on the Government to prove by clear and convincing evidence that the detainee poses a danger or flight risk. *Salazar Dedos*, 2025 WL 2676729, at *6-9 (Sept. 17, 2025); *Lopez-Alvarez v. Ripa*, 2025 WL 2691828 (W.D. Tex. Sept. 22, 2025); *Kostak v. Trump*, 2025 WL 2472136 (W.D. La. Aug. 27, 2025) (same); *Roman v. Noem*, 2025 WL 2710211 (D. Nev. 23, 2025); *Ochoa Ochoa v. Noem*, No. 1:25-cv-10865 (N.D. Ill. Oct. 16, 2025).

Prayer for Relief

WHEREFORE, Petitioner respectfully request that this Honorable Court:

A. Accept jurisdiction over this action;

B. Order the immediate release of Petitioner pending these proceedings;

C. Order Respondents not to transfer Petitioner out of the Western District of Oklahoma during the pendency of these proceedings to preserve jurisdiction;

D. Declare that Respondents' actions to detain Petitioner violate the Immigration and Nationality Act and violate the Due Process Clause of the Fifth Amendment;

E. Issue a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 and order Respondents to immediately release Petitioner from custody, or, in the alternative, order Respondents to show cause why this Petition should not be granted within three days; or

F. In the alternative, Order Respondents to provide a bond hearing within five days, where the burden is on Respondents to demonstrate Petitioner is a danger to the community or a flight risk;

G. Award reasonable attorneys' fees and costs for this action; and

H. Grant such further relief as the Court deems just and proper.

Dated: December 3, 2025

Respectfully Submitted,

/s/ Brittni Rivera
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VERIFICATION OF COUNSEL

I, Brittni Rivera, hereby certify that I am familiar with the case of the named Petitioner and that the facts as stated above are true and correct to the best of my knowledge and belief.

/s/ Brittni Rivera