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CENTRAL DISTRICT OF CALIFORNIA
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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SAGASTEGUI-RONCEROS LUIGUI
MARTIN

Petitioner,

v.

FERETI SEMAIA, in official capacity, Facility
Administrator of Adelanto ICE processing center;
ERNESTO SANTACRUZ, in official capacity,
Field Office Director of ICE's Los Angeles Field
Office; TODD LYONS, Acting Director of United
States of Immigration and Customs Enforcement;
KRISTI NOEM, Secretary of the United States
Department of Homeland Security, PAMELA
BONDI, Attorney General of the United States,
acting their official capacities, ERIKA S. ROJAS,
in official capacity, United States

Respondents.

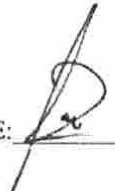
CASE NO. 5:25-cv-03324-SVW-BFM

**NOTICE AND REPLAY TO
GOVERNMENT OPPOSITION TO
PETITIONER'S *EX PARTE*
APPLICATION FOR TEMPORARY
RESTRAINING ORDER**

**[Exhibit A and Exhibit B submitted
concurrently]**

Honorable Stephen V. Wilson
United States District Judge

Honorable Brianna F. Mircheff
United States Magistrate Judge

SIGNATURE: 

PETITIONER'S SWORN STATEMENT

Petitioner, Sagastegui-Roncero Luigie Martin, does hereby declare and state as follows:

1. On December 11, 2025, the immigration judge granted Department Homeland Security (DHS) motion to pretermite Petitioner's application for asylum and ordered Petitioner removed to Honduras. This is not a final removal because the Petitioner reserved appeal and is well within his time to appeal to the Board of Immigration Appeals (BIA), which is 30 days from the date of order.

2. On December 19, 2025, Petitioner's immigration attorney submitted all the documentation and payment needed to appeal to the Board of Immigration Appeals (BIA). In this sense, Petitioner is currently waiting for the BIA decision, which one could take up to several months for the BIA to make a final decision.

3. On December 19, 2025, Petitioner received the Federal Respondents' government opposition to Petitioner's Ex Parte Application for Temporary Restraining Order (TRO) via mail.

4. Respondents reasons and arguments have some discrepancies and are not truly accurate. Petitioner would like to replay to these reasons and arguments in the following paragraphs.

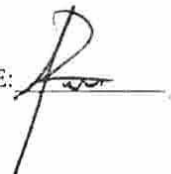
5. On December 22, 2025, Petitioner's replay for the Respondents First Reason, government's attorney states the following: "*Petitioner fails to make any evidentiary showing of putative re-detention violation that would justify immediate habeas release.*" Petitioner's replay: "I have limited access to provide any additional evidences since I submitted this TRO petition being in detention at Adelanto Detention Facility. However, I attached some proofs concurrently in this NOTICE TO REPLAY that could justify putative re-detention violation such as my parole granted by Enforcement and Removal Operations (ERO) (see **Exhibit B**)."

6. On December 22, 2025, Petitioner's replay for the Respondents Third Reason, which one has three parts. Third reason – First part, government's attorney states the following: "*On or about October 22, 2023, Petitioner was arrested for Kidnapping, in violation of California Penal Code Section (CPC) 207(a), False Imprisonment, in violation of CPC § 236, and Domestic Battery, in violation of CPC 243(e)(1).*" Petitioner's replay: "As I said in my Writ of Habeas Corpus Petition '*I have never been convicted of any crime*'. This arrest ended up on October 24, 2023 with two misdemeanors charges according to the Judge's decision. On June 16, 2025, these charges were dropped and the case was dismissed and close. I have the court minutes of the case as evidence proving the misdemeanors charges and that the case is currently dismissed and close (see **Exhibit A**)".

1 7. On December 22, 2025, Petitioner’s replay for Respondents Third Reason – Second
2 part, government’s attorney states the following: “*On August 19, 2024, Petitioner was placed into*
3 *removal proceedings via a Notice to Appear (NTA) placing him in removal proceedings under 8 U.S.C.*
4 *§ 1182(a)(6)(A)(i) as an alien present in the United States without being admitted or paroled, or who*
5 *arrived in the United States at any time or place other than as designated by the Attorney General*”.
6 Petitioner’s replay: “I entered the United States of America on May 22, 2022. On May 23, 2023,
7 United States Customs and Border Protection (CBP) transferred me to Enforcement and Removal
8 Operations (ERO) custody. Then I was detained at Karnes County Immigration Processing Center in
9 Karnes City, Texas. On June 3, 2022, ERO released me on ‘parole’ (see **Exhibit B**). Therefore, I was
10 admitted to enter the United States of America by ERO and what government’s attorney states is not
11 correct”.

12 8. On December 22, 2025, Petitioner’s replay for Respondents Third Reason – Third part,
13 government states the following: “*On October 22, 2025 Petitioner reported to ERO to be fitted with a*
14 *GPS tracking ankle bracelet.... On this date however, Petitioner refused to wear the GPS tracking*
15 *ankle bracelet, so he was terminated from the Alternative To Detention (ATD) program and taken into*
16 *custody*”. Petitioner’s reply: “Your honorable Judge, I did not refuse to wear the GPS tracking ankle
17 bracelet, I asked the ATD’s officer ‘why should I wear it and if there were another options since I am
18 not a flight risk or a danger to community because I have never missed any immigration court and any
19 ICE check-ins. However, the ATD’s officer did not explain me and he just called ICE officers to arrest
20 me without an explanation. I did apologize to ICE officers for my question ‘why’ but they did not
21 listen to me and they told me that they were there to arrest me. I really regret about my question but it
22 did not mean that I refused it, however, now I am willing to use any electronic monitoring system on
23 my body including GPS tracking ankle bracelet.”

24 9. On December 22, 2025, Petitioner’s replay for the Respondents Argument A,
25 government states the following: “*Petitioner Has Not Shown That the Government Lacked Authority to*
26 *Detain Him, That the Government Revoked Him Release Improperly, Or That the Remedy Would Be*
27 *His Immediate Release*”. Petitioner’s reply: “Your honorable Judge, I gained a protected liberty interest
28 in my ongoing freedom from confinement on June 3, 2022, after ERO released me on parole. The
29 Supreme Court ‘usually has held that the Constitution requires some kind of a hearing *before* the State
30 deprives a person of liberty or property. *Zinerman v. Burch*, 494 U.S. 113, 127 (1990)’. The
31 government acknowledged its error in its Argument B when states the following: ‘*Even If a Parole*



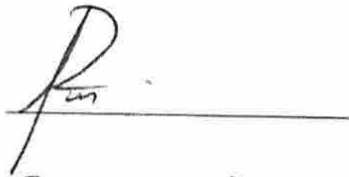
1 *Revocation Problem Were Established, Immediate Habeas Relief Would not Be the Narrowly Tailored*
2 *Remedy*'. What they did to my immigration case was a 'Parole Revocation without a hearing or
3 notice', and it is not a lawful process according to the Due Process Clause. Furthermore, the
4 government states the following: '*Here, if there were some defect in the revocation of Petitioner's*
5 *parole status – which the TRO Application does not established ...*'. Petitioner's replay continuation:
6 "In this sense, your honorable Judge the government acknowledged that they were some defect in the
7 revocation of my parole. Finally, I respectfully request that this Court issue a TRO immediately
8 releasing from Respondents' custody and prohibiting my re-detention absent the opportunity to contest
9 that arrest at a hearing before a neutral decision maker."

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Pursuant to 28 U.S.C. § 2242, I declare, under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 24, 2025, at Adelanto Detention Facility, Adelanto, California.

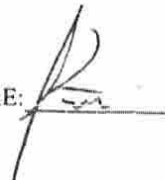
Signature:



Date: 12/30/25

Name:

Sagastegui-Ronceros LUIGIE MARTIN



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Exhibit B

copy

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

Date: June 01, 2022

In Reference to: A# [Redacted]

INTERIM NOTICE AUTHORIZING PAROLE

This letter is to inform you that U.S. Immigration and Customs Enforcement (ICE) has decided to parole you from its custody pursuant to its authority under section 212(d)(5)(A) of the Immigration and Nationality Act. This notice is being issued to you in lieu of Form I-94, *Arrival-Departure Record*, see 8 C.F.R. § 235.1(h)(2), and you should maintain a copy of this letter in your possession at all times

Your parole authorization is valid for one year beginning from the date on this notice and will automatically terminate upon your departure or removal from the United States or at the end of the one-year period unless ICE provides you with an extension at its discretion. ICE may also terminate parole on notice prior to the automatic termination date. Parole is entirely within the discretion of ICE and can be terminated at any time and for any reason. Your parole is not valid for work authorization and is not an admission in lawful status.

Parole is conditioned on you complying with the terms and conditions of your release. You must notify ICE and the immigration judge of any address correction or address change. You must report for every scheduled hearing before the immigration court and every appointment as directed by ICE (including for removal from the United States should you become subject to a final removal order). You must not violate any local, State or Federal laws or ordinances. You must comply with any other specified conditions if identified separately.

I certify that I received a copy of this notice.

SAGASTEGUI-RONCEROS, LUIGUIE	x		6/1/2022
Alien Name		Alien Signature	Date

CERTIFICATE OF SERVICE

I certify that on today's date, I served the respondent a copy of this parole notice by the following method (as checked):

In Person Other _____

DO D. Czerniak		6/1/2022
ICE Official Name	ICE Official Signature	Date

J1560 Benavidez
Sup Det & Dep Officer
DHS-ICE

6/1/22

PROOF OF SERVICE BY MAILING

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On December 24, 2025, I, Sagastegui-Ronceros Luigui Martin, served this **NOTICE AND REPLAY TO GOVERNMENT OPPOSITION TO PETITIONER'S EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER** on each person or entity named below by enclosing a copy in an envelope with postage fully prepaid and addressed as shown below and placing the envelope for collection and mailing with the United States Postal Service on the date and at the place shown below.

Date of mailing: December 24, 2025. Place of mailing: Adelanto, California.

Person(s) and/or Entity(ies) to Whom mailed:

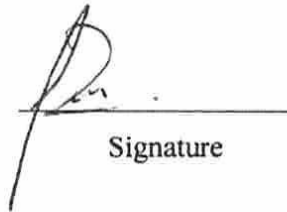
Office of the Clerk
U.S. District Court for Central District of California
Western Division
255 East Temple Street, Suite TS-134
Los Angeles, CA 90012

Erika S. Rojas
United States Attorney's Office, Central District of California
300 N. Los Angeles Street, Suite 7516
Los Angeles, CA 90012

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 24, 2025, at Adelanto Detention Facility, Adelanto, California.

Sagastegui-Ronceros Luigui Martin
Name



Signature