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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF ARIZONA**

**Carlos Johany Gomez-Molina,**  
**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 Carlos Johany Gomez-Molina 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

1 (BIA) issued a precedential decision on September 5, 2025, holding that all noncitizens  
2 present in the United States without admission – no matter how long they have resided  
3 here – are still “applicants for admission” under 8 U.S.C. § 1225(a) and not entitled to bond  
4 hearings because they are subject to mandatory detention under § 1225(b)(2)(A). See,  
5 *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (B.I.A. 2025) filed herewith as Exhibit 2.  
6

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.  
13

14 Petitioner has been living in the United States for more than 20 years and has 3  
15 U.S. Citizen children, all born in Phoenix, Arizona. See, Petitioner’s Exhibits Filed In  
16 Support Of Bond Hearing, filed herewith as Exhibit 4. Although he was convicted of a DUI  
17 in 2013, he is without a repeat of this or any other criminal conduct since then. See,  
18 8/27/2025 IJ Order filed herewith as Exhibit 10. Further, when Respondents issued a  
19 Notice to Appear, it identified Petitioner as an “alien present in the United States” despite  
20 “arriving alien” being an option. See, Petitioner’s Notice to Appear, filed herewith as Exhibit  
21 5.  
22

23 In addition to BIA decisions not being binding precedent upon this Court, the  
24 Supreme Court decision last year in *Loper Bright Enterprises v. Raimondo*, 603 U.S. 369,  
25 400 (2024), made clear that federal courts must independently interpret statutes and no  
26 longer defer under so-called “*Chevron* deference.” This Court is therefore in the best  
27  
28

1 position to determine whether the Respondents are misinterpreting the relevant federal  
2 statutes and improperly denying alien detainees bond hearings on the grounds that they  
3 are subject to mandatory detention under § 1225(b)(2)(A). The petition for writ of habeas  
4 corpus should be granted.

### 6 JURISDICTION & CUSTODY

7 1. Petitioner Carlos Johany Gomez-Molina is in the physical custody of  
8 Respondents and Immigration and Customs Enforcement (ICE), an agency within the  
9 Department of Homeland Security.  
10

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 12/2/2025 ICE Locator Page filed herewith as Exhibit 6.

14 3. This action arises under the Constitution of the United States and 8  
15 U.S.C. § 1101 *et seq.*

16 4. This Court has jurisdiction under 28 U.S.C. § 2241, Art. I § 9, cl. 2 of the  
17 United States Constitution, 28 U.S.C. § 1331, and the common law. This Court may  
18 grant relief pursuant to 28 U.S.C. § 2241, the Declaratory Judgment Act, 28 U.S.C. §  
19 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.  
20

21 5. Congress has preserved judicial review of challenges to immigration  
22 detention. See *Jennings v. Rodriguez*, 583 U.S. 122, 130-131 (2018) (holding that 8  
23 U.S.C. §§ 1226(e) and 1252(b)(9) do not bar review of challenges to prolonged  
24 immigration detention).  
25

26 6. The Court must grant the petition for writ of habeas corpus or order  
27 Respondents to show cause “forthwith,” unless the petitioner is not entitled to relief. 28  
28

1 U.S.C. § 2243. If an order to show cause is issued, Respondents must file a return  
2 “within three days unless for good cause additional time, not exceeding twenty days, is  
3 allowed.” *Id.*


4 7. The Court has inherent power to release the petitioner pending review  
5 of his petition. *See Martin v. Solem*, 801 F.2d 324, 329 (8th Cir. 1986).  
6

7 **VENUE**

8 8. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S.  
9 484, 493- 500 (1973), venue lies in this Court, the federal judicial district in which  
10 Petitioner is currently is in custody.

11 9. Venue is also properly in this Court pursuant to 18 U.S.C. § 1391(e)  
12 because Respondents are employees, officers, and agencies of the United States.  
13

14 **PARTIES**

15 10. Petitioner Carlos Johany Gomez-Molina was born on  in  
16 Chiapas, Mexico and he is currently detained by ICE at Florence Correctional Center in  
17 Florence, Arizona. *See*, Petitioner’s Mexican Passport, the first exhibit to Petitioner’s  
18 Exhibits in Support of Bond Hearing, filed herewith as Exhibit 4.  
19

20 11. Respondent Kristi Noem is the Secretary of the U.S. Department of  
21 Homeland Security (“DHS”). In this capacity, Respondent Noem is a legal custodian of  
22 Petitioner. Respondent Noem is sued in her official capacity.

23 12. Respondent DHS is a federal executive agency responsible for, among  
24 other things, enforcing federal immigration laws and overseeing lawful immigration to the  
25 United States. Respondent DHS is a legal custodian of Petitioner.  
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1 Exhibits in Support of Bond Hearing, filed herewith as Exhibit 4.

2 18. Petitioner has been living in the United States for more than 20 years.  
3 See, 8/27/2025 IJ Order filed herewith as Exhibit 10.

4 19. He has 3 U.S. Citizen children, all born in Phoenix, Arizona. See,  
5 Petitioner's Exhibits Filed In Support Of Bond Hearing, led herewith as Exhibit 4.  
6

7 20. Petitioner was convicted of a DUI in 2013, but he has had no other  
8 criminal conduct since then. See, 8/27/2025 IJ Order filed herewith as Exhibit 10.

9 21. Respondents arrested Petitioner on June 23, 2025. See, Petitioner's  
10 Notice to Appear, filed herewith as Exhibit 5.  
11

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

15 23. Petitioner was detained at the Florence Correctional Center in Florence,  
16 Arizona. See, 12/2/2025 ICE Locator page filed as Exhibit 6.  
17

18 24. On August 6, 2025, Petitioner filed a bond determination request and  
19 on August 11, 2025 a custody redetermination hearing was held before an Immigration  
20 Judge (IJ). The 2-page written order entered that day granted Petitioner's release upon  
21 the posting of a \$10,000 bond. See, 8/11/2025 IJ Order filed herewith as Exhibit 9.

22 25. DHS appealed and on August 27, 2025 the IJ issued a more detailed  
23 written decision and order, holding that Petitioner "does not present a danger to persons  
24 or property" and that he only "present[s] a mild risk of flight, but that the flight risk can be  
25 mitigated through a bond. . . . of \$10,000." See, 8/27/2025 IJ Decision and Order filed  
26 herewith as Exhibit 10.  
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1 prevent flight. *Id.*; *Demore*, 538 U.S. at 528. The government may not detain a  
2 noncitizen based on any other justification.

3 31. Congress has granted the Attorney General discretion to decide  
4 whether to detain or release certain noncitizens pending a removal decision. See 8  
5 U.S.C. § 1226(a). The Attorney General has delegated that authority to IJs. 8 C.F.R. §§  
6 1003.19, 1236.1.  
7

8 32. On July 8, 2025, DHS adopted a new policy on mandatory detention for  
9 noncitizens who have been residing in the United States. See, ICE Memo: Interim  
10 Guidance Regarding Detention Authority for Applications for Admission filed herewith as  
11 Exhibit 1.  
12

13 33. On September 5, 2025, the BIA entered the precedential decision *Matter*  
14 *of Yajure Hurtado*, 29 I&N Dec. 216 (B.I.A. 2025), filed herewith as Exhibit 2, which holds  
15 that all noncitizens who enter without inspection are “applicants for admission” under 8  
16 U.S.C. § 1225(a) and therefore subject to mandatory detention under § 1225(b)(2), without  
17 regard for the length of time they have lived in the United States.  
18

19 34. The Ninth Circuit has held that § 1226(a) is the “default” detention statute  
20 for aliens in removal proceedings “[8 U.S.C. §1226(a) (“Subsection A”)] is the default  
21 detention statute for noncitizens in removal proceedings and applies to noncitizens  
22 “[e]xcept as provided in [Subsection C].” 8 U.S.C. § 1226(a).” *Avilez v. Garland*, 69 F. 4th  
23 525, 529-530 (9th Cir. 2022). *Accord, Rodriguez Diaz v. Garland*, 83 F. 4th 1177, 1179  
24 (9th Cir. 2023); *Sarr v. Scott*, 765 F. Supp. 3d 1091, 1095 (WD Wash. 2025); *Prieto-*  
25 *Romero v. Clark*, 534 F.3d 1053, 1057 (9th Cir. 2008). *Casas-Castrillon v. DHS*, 535 F.3d  
26 942 (9th Cir. 2008).  
27  
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1 35. On November 12, 2025, Judge William M. Conley of the Western  
2 District of Wisconsin issued a 17-page order carefully examining these issues and  
3 gathering cases, noting that:

4 ...more than 45 district courts have now rejected similar arguments  
5 made by respondents here and ordered bond hearings for noncitizens  
6 who, like petitioner, were apprehended within the United States years  
7 after entering without admission or inspection unless implicated by any  
8 criminal activity covered by § 1226(c). These decisions, along with a  
9 growing number of others now including this court have concluded that  
10 the statutory text, the statute's history, Congressional intent, and §  
11 1226(a)'s application for the past three decades support its application to  
12 noncitizens in petitioner's position. (cleaned up - collecting cases in  
13 footnote 6)

14 *Quinapanta v. Bondi*, Case No. 25-cv-795-WMC (W.D. Wisc. 11/12/2025), filed herewith  
15 as Exhibit \*4 F.3d 1053, 1057 (9th Cir. 2008).

16 36. In Arizona, the following cases have recently held:

17 1) Order granting habeas in *Millan-Osuna v. Cantu, et al.*, Case No.  
18 25-cv-04019-MTL--JFM (D. Ariz. 11-26-25) ("Respondents' view represents  
19 the minority position—in the weeks since Judge Lanza considered the issue  
20 in *Echevarria*, dozens of other courts have reached the same conclusion....  
21 Petitioner must receive a bond hearing under 8 U.S.C. § 1226(a)."), filed with  
22 the Habeas Petition as Exhibit 12;

23 2) Order granting habeas in *Luna-Gonzalez v. Noem, et al.*, Case  
24 No. 25-cv-03794-MTL (D. Ariz. 11-26-25) ("Having reviewed the recent  
25 decisions adopting the minority view, the Court agrees with the conclusion  
26 reached by Judge Lanza in *Echevarria*."), filed with the Habeas Petition as  
27 Exhibit 13;

28 3) Order granting habeas in *Najarro Zuniga v. Bondi, et al.*, Case  
No. 25-cv-04175-SHD (D. Ariz. 11-24-25) ("In the OSC, the Court observed  
that Petitioner's case was virtually indistinguishable from Francisco  
Echevarria... in which Judge Lanza determined individuals like Petitioner are  
governed by § 1226 and not § 1225(b)(2)(A)."), filed with the Habeas Petition  
as Exhibit 14;

4) Order granting habeas in *Padron-Carreron v. Noem, et al.*, Case  
No. 25-cv-04204-DWL (D. Ariz. 11-24-25) ("having carefully reviewed the

1 recent decisions adopting the minority view, the Court respectfully declines to  
2 revisit the conclusion it reached in *Echevarria*.”), filed with the Habeas Petition  
as Exhibit 15;

3 5) Order granting habeas in *Rodriguez Plascencia v. Bondi, et al.*,  
4 Case No. 25-cv-03794-MTL (D. Ariz. 11-21-25)(“having carefully reviewed the  
5 recent decisions adopting the minority view, the Court respectfully declines to  
6 revisit the conclusion it reached in *Echevarria*.”), filed with the Habeas Petition  
as Exhibit 16;

7 6) Order granting habeas in *Rodrigues da Silva v. Figueroa, et al.*,  
8 Case No. 25-cv-04015-PHX (D. Ariz. 11-18-25)(“dozens of other district  
9 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 17;

10 7) Order granting habeas in *Perez Rodriguez v. Noem, et al.*, Case  
11 No. 25-cv-03921-PHX (D. Ariz. 11/13/2025)(“the vast majority of courts  
12 concluded individuals like Petitioner are subject to § 1226 and not § 1225  
13 and, therefore, are not subject to mandatory detention”), gathering cases,  
filed with the Habeas Petition as Exhibit 18;

14 8) Order granting habeas in *Gonzalez Rodriguez v. Bondi, et al.*,  
15 Case No. 25-cv-03917-PHX (D. Ariz. 11-6-25)(“dozens of other district courts  
16 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 19;

17 9) Order granting habeas in *Abrego-Zarate v. Noem, et al.*, Case  
18 No. 25-cv-03564-KML (D. Ariz. 11-6-25)(“in accord with numerous other  
19 courts addressing the same issue—‘Respondents’ narrow focus on the  
20 language of § 1225(a)(1) fails to take account of the entirety of the statutory  
21 scheme...” *citing to Echevarria v. Bondi, et al.*, CV-25-03252-PHX-DWL  
(ESW), 2025 WL 2821282, at \*9 (D. Ariz. October 3, 2025)), filed with the  
Habeas Petition as Exhibit 20;

22 10) Order granting habeas in *Garcia-Rosales v. Noem, et al.*, No.  
23 2:25-cv-03391-SHD-DMF at page 2 (D. Ariz. Oct. 22, 2025)(“while  
24 Respondents point to two district court opinions adopting their interpretation  
of § 1225(b)(2)(A), myriad other district courts have reached the same  
25 conclusion as *Echevarria* and held individuals like Petitioner are not subject to  
26 mandatory detention under 1225(b)(2)(A)”), filed with the Habeas Petition as  
Exhibit 21;

27 11) Order granting habeas corpus in *Benitez-Cornejo v. Cantu, et al.*,  
28 No. 2:25-cv-03672 (D. Arizona Oct. 17, 2025)(“individuals like Petitioner are  
not “arriving aliens” subject to mandatory detention but, rather, are subject tot

1 he general removal statute, 8 U.S.C. § 1226(a)”), filed with the Habeas  
2 Petition as Exhibit 22;

3 12) Order granting habeas entered in *Hector Lopez-Melo v. Bondi,*  
4 *et. al.*, Case No. Case 2:25-cv-03394-DJH--JZB (D. Ariz.  
5 10/9/2025)(“petitioner, who had been present in the United States for years,  
6 was not an applicant for admission under 1225(b)(2)(A) or subject to  
7 mandatory detention”); filed with the Habeas Petition as Exhibit 23.

8 13) Order granting habeas corpus in *Bo Li v. Cantu, et al.*, No. CV-  
9 25-02989-PHX-SPL (D Arizona 10/07/2025)(“Respondents maintain he is  
10 subject to mandatory detention under 1225(b)(2). Again, Respondents are  
11 mistaken.”); filed with the Habeas Petition as Exhibit 24.

12 37. In *Padron-Carreron*, the Court commented that “Respondents point to  
13 “at least five federal courts that have joined what the government acknowledges is a  
14 minority position on whether § 1225 applies to persons in Petitioner’s position rather  
15 than § 1226.”<sup>1</sup> The Court also mentioned four more that it was aware of.<sup>2</sup> However, it  
16 concluded that “it is unsurprising that judges across the country are not in full agreement  
17 on how this issue should be resolved—indeed, the Court previously emphasized that “it  
18 views this issue as presenting a complicated and debatable question.” *Echevarria*, 2025  
19 WL 2821282 at \*5.

20 38. In 1997, after Congress amended the INA through the Illegal  
21 Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA), EOIR and the  
22 then-Immigration and Naturalization Service issued an interim rule to interpret and apply

23  
24 <sup>1</sup> 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.  
27 Mass. 2025).

28 <sup>2</sup> Those decisions are *Valencia v. Chestnut*, 2025 WL 3205133 (E.D. Cal. 2025); *Alonzo v. Noem*,  
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 IIRIRA. Specifically, under the heading of “Apprehension, Custody, and Detention of  
2 Aliens,” the agencies explained that:

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

7           62 Fed. Reg. at 10323 (emphasis added). The agencies thus made clear that individuals  
8           who had entered without inspection **were** eligible for consideration for bond and bond  
9           hearings before IJs under 8 U.S.C. § 1226 and its implementing regulations.

10           39.           Thus, for almost 30 years, all participants in the immigration system  
11           have understood that people arrested inside the United States generally fall within §  
12           1226 for detention purposes and are therefore required to receive a bond hearing upon  
13           request—even if they initially entered the country without permission. *See Martinez v.*  
14           *Hyde*, No. 25-11613, 2025 WL 2084238, at \*4 n.9 (D. Mass. July 24, 2025) (citing the  
15           United States Solicitor General’s representation to the Supreme Court at oral argument  
16           that “DHS’s long-standing interpretation has been that 1226(a) applies to those who  
17           have crossed the border between ports of entry and are shortly thereafter  
18           apprehended”).

19           40.           Despite the overwhelming number of federal cases that have ruled  
20           against the government’s position, DHS and DOJ are continuing to systemically  
21           misclassify people and unlawfully deny them access to bond hearings and release on  
22           bond during the pendency of their immigration proceedings.  
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**CLAIMS FOR RELIEF**  
**FIRST CLAIM FOR RELIEF**

**Violation of Fifth Amendment – Substantive Due Process**

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2  
3 41. Petitioner realleges and incorporates herein the allegations contained in  
4 the preceding paragraphs of the petition as if fully set forth herein.

5 42. The Due Process Clause of the Fifth Amendment forbids the  
6 government from depriving any “person” of liberty “without due process of law,” including  
7 noncitizens. U.S. Const. amend. V.

8  
9 43. Substantive due process asks whether a person’s life, liberty, or  
10 property is deprived without sufficient purpose. There is no question that Petitioner has  
11 been deprived of his liberty in this case.

12 44. The government’s continued detention of Petitioner is not supported by  
13 any special interest or compelling justification that outweighs his liberty interest.

14 45. Petitioner’s ongoing detention when so many federal courts have held  
15 that he is entitled to be considered for release upon posting an appropriate bond under §  
16 1226 constitutes prolonged detention and violates his substantive due process rights.  
17

18  
19 **SECOND CLAIM FOR RELIEF**  
**Violation of Fifth Amendment Right - Procedural Due Process**

20 46. Petitioner realleges and incorporates herein the allegations contained in  
21 the preceding paragraphs of the petition as if fully set forth herein.

22 47. The Due Process Clause of the Fifth Amendment guarantees Petitioner  
23 the right to procedural due process in seeking a bond redetermination and the  
24 government may not unreasonably restrict this right.

25 48. The government’s knowing misclassification of Petitioner as an  
26 “applicant for admission” under § 1225 in order to justify its argument for mandatory  
27  
28

1 detention is not supported by any special interest or compelling justification that  
2 outweighs Petitioner's liberty interest.

3 49. The continued detention of Petitioner is not supported by any special  
4 interest or compelling justification that outweighs his liberty interest.

5  
6 **PRAYER FOR RELIEF**

7 **WHEREFORE** Petitioner Carlos Johany Gomez-Molina respectfully requests  
8 that the Court grant the following relief:

- 9 1. Assume jurisdiction over this matter;  
10 2. Order Respondents not to transfer Petitioner out of this District  
11 during the pendency of these proceedings, to preserve jurisdiction;  
12 3. Issue a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 and  
13 order Respondents to immediately release Petitioner from custody or, in  
14 the alternative, order Respondents to provide Petitioner a bond hearing  
15 under 8 U.S.C. § 1226, and without regard to the holding of *Matter of*  
16 *Yajure Hurtado*, 29 I&N Dec. 216 (B.I.A. 2025), within three (3)  
17 business days;  
18 4. Award Petitioner reasonable attorneys' fees and costs pursuant to  
19 the Equal Access to Justice Act, 28 U.S.C. § 2412; and  
20 5. Grant any further relief the Court deems just and proper.

21 Dated: December 9, 2025, 2025

Attorney for Respondent

22 By: /s/ Erica Sanchez  
23 Erica Sanchez, Of Counsel  
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**VERIFICATION PURSUANT TO 28 U.S.C. § 2242**

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

6  
7 Dated: 9th day of December, 2025, 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 Exhibits Filed In Support Of Bond Hearing
Exhibit 5.	Notice to Appear
Exhibit 6.	12/2/2025 ICE Locator Page for Petitioner
Exhibit 7.	Petitioner's Application for Asylum and for Withholding of Removal
Exhibit 8.	DHS Exhibits Filed In Support Of Bond Hearing
Exhibit 9.	8/11/2025 IJ Order Granting Bond
Exhibit 10.	8/27/2025 IJ Decision and Order Granting Bond
Exhibit 11.	10/24/2025 BIA decision Reversing IJ Orders
Exhibit 12.	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 13.	Order granting habeas in <i>Luna-Gonzalez v. Noem, et al.</i> , Case No. 25-cv-03794-MTL (D. Ariz. 11-26-25)
Exhibit 14.	Order granting habeas in <i>Najarro Zuniga v. Bondi, et al.</i> , Case No. 25-cv-04175-SHD (D. Ariz. 11-24-25)
Exhibit 15.	Order granting habeas in <i>Padron-Carreron v. Noem, et al.</i> , Case No. 25-cv-04204-DWL (D. Ariz. 11-24-25)
Exhibit 16.	Order granting habeas in <i>Rodriguez Plascencia v. Bondi, et al.</i> , Case No. 25-cv-03794-MTL (D. Ariz. 11-21-25)
Exhibit 17.	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 18.	Order granting habeas in <i>Perez Rodriguez v. Noem, et al.</i> , Case No. 25-cv-03921-PHX (D. Ariz. 11/13/2025)
Exhibit 19.	Order granting habeas in <i>Gonzalez Rodriguez v. Bondi, et al.</i> , Case No. 25-cv-03917-PHX (D. Ariz. 11-6-25)
Exhibit 20.	Order granting habeas in <i>Abrego-Zarate v. Noem, et al.</i> , Case No. 25-cv-03564-KML (D. Ariz. 11-6-25)
Exhibit 21.	10/22/2025 Order entered in <i>Garcia-Rosales v. Noem, et al.</i> , No. 2:25-cv-03391-SHD—DMF (D. Ariz. Oct. 22, 2025)
Exhibit 22.	10/17/2025 Order granting habeas corpus in <i>Benitez-Cornejo v. Cantu, et al.</i> , No. 2:25-cv-03672 (D. Arizona Oct. 17, 2025)
Exhibit 23.	10/9/2025 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 24.	10/07/2025 Order granting habeas corpus in <i>Bo Li v. Cantu, et al.</i> , No. CV-25-02989-PHX-SPL (D Arizona 10/07/2025)