

Karen L. Hoffmann, Esq.  
PA ID No. 323622  
ELLENBERG LAW GROUP  
1500 JFK Blvd., Suite 1825  
Philadelphia, PA 19102  
(215) 790-1682  
karen@sellenberglaw.com

*Attorneys for Petitioner*

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

Luis Angel MALDONADO FLORES



Petitioner,

v.

Craig LOWE, in his official capacity as  
Warden, Pike County Correctional  
Facility; Kristi NOEM, in her official  
capacity as Secretary, U.S. Department  
of Homeland Security; U.S.  
DEPARTMENT OF HOMELAND  
SECURITY; and Pamela BONDI, U.S.  
Attorney General,

Respondents.

Case No.

**VERIFIED PETITION FOR WRIT OF HABEAS CORPUS**

## INTRODUCTION

Petitioner Luis Angel Maldonado Flores is a 26-year-old Honduran national and DACA recipient who has resided in the United States since the age of 4 years old, when he was brought across the border by his mother and entered without inspection in 2003. Luis had no control over his immigration to the United States. On September 24, 2004, Luis and his mother were granted voluntary departure by this Court. For reasons outside of Luis's control, Luis's mother did not comply with the terms of voluntary departure, and, subsequently, a final order of removal was entered against him. Being five years old, Luis had no control over whether he complied with the terms of voluntary departure.

In 2015, Luis applied for and was granted Deferred Action through the Deferred Action for Childhood Arrivals ("DACA") program. In 2017, Luis' father brought him back to Honduras. Unfortunately, country conditions significantly deteriorated after Luis arrived, and when his father passed away, the family received threats. In 2021, fearing for his life, Luis returned to the United States by entering without inspection. He was not encountered by ICE or CBP at the time of his 2021 entry.

Luis has a partner, Daiana Briyith Diaz Quiroz, who is the mother of their U.S. citizen child. Daiana has an approved Special Immigrant Juvenile Status ("SIJS") with deferred action. With current processing times, it will be

approximately a year before she can apply for Legal Permanent Residence, at which point she can file a family-based petition for Luis once they are married.

On December 2, 2025, Luis had just gotten in his car to go to work when he was approached and detained by ICE. Luis was subsequently sent to Pike County Detention Center in Pennsylvania. Since his detention, Luis has been attempting to marry his partner Daiana. However, ICE Officer John J. Coulter, Jr., has advised the petitioner's counsel that ICE is unlikely to facilitate the marriage, citing imminent removal. *See* ICE Email, attached hereto as Exhibit "A".

Luis is currently detained under the provisions of 8 U.S.C. § 1231. Luis has filed a Motion to Reopen his removal proceedings before the Detroit, Michigan Immigration Court. *See* Motion to Reopen, attached hereto as Exhibit "B". That motion remains unadjudicated. Alongside Luis's Motion to Reopen, Luis filed a motion for a stay of removal before the Immigration Court. However, the Immigration Court generally will not adjudicate a stay motion unless deportation is imminent—at a maximum, within 3 business days. *See* Immig. Ct. Practice Manual Ch. 8.3(c)(2)(A). The stay has not yet been decided by the Court.

In his motions to the Immigration Court, Luis asserts that his immigration court proceedings should be reopened based on new and previously unavailable evidence of country conditions in his native Honduras where Luis, as a young male deportee, faces persecution, torture, and even death. *See* 8 U.S.C. § 1229a(c)(7)(B),

(C)(ii); 8 C.F.R. § 1003.23(b)(4)(i). In addition, Luis submits that his case warrants the equitable tolling of the filing deadline for motions to reopen, and that in the alternative, his case presents an exceptional situation because of his young age at the time his removal order was entered, his past DACA status, and his mother's physical abuse at the hands of his father.

There are multiple compelling humanitarian reasons for granting this petition. Luis has not yet been able to present an application for asylum or withholding of removal for the persecution or torture he faces upon returning to Honduras. As a young Honduran man, Luis faces the near-certain prospect that he will be targeted for recruitment in gang membership, a violent and often deadly process. Luis is also responsible for caring for his U.S. citizen son, who is only two years old. And the reason for Luis's order of removal was completely out of his control: Luis was ordered removed at only four or five years old, when his mother, for reasons wholly outside of Luis's control, failed to depart the country. Given the above, Luis's motion to reopen requests that the Court reopen his case so that he may pursue relief by marrying his partner, filing a family-based petition for adjustment of status when her priority date becomes current, and filing for asylum and withholding of removal.

ICE has stated that Luis's deportation is imminent, and therefore they will not be able to facilitate the marriage that would give him a pathway to legal status

in the United States. But in the eyes of the immigration court, Luis's deportation is not imminent enough to adjudicate the stay of removal that would allow Luis to marry his partner. This leaves Luis in a position where filing a petition for habeas corpus in federal district court, along with a motion for a Temporary Restraining Order seeking the federal government to be enjoined from deporting Luis, is likely his only relief from imminent deportation.

The Immigration Court is likely to grant Luis's motion as he has a compelling claim for relief through his imminent family-based petition and through his application for asylum or for withholding of removal. Luis would suffer irreparable harm if removed from the United States and from his partner and two-year-old child. DHS will not be substantially injured if Luis's removal is stayed while the Immigration Court considers his Motion to Reopen.

For all of these reasons, this Court should grant Luis's habeas petition and order the government to stay Luis's removal until he is able to fully adjudicate his motion to reopen his removal proceedings, including any petition for review to the U.S. Court of Appeals.

## **PARTIES**

1. Petitioner Luis Angel Maldonado Flores is a citizen of Honduras and former DACA recipient currently being held in immigration detention at the Pike County Correctional Facility since December 2, 2025.

2. Respondent Warden Craig Lowe is the Warden of the Pike County Correctional Facility. As such, Warden Lowe is Petitioner's immediate custodian and is responsible for Petitioner's detention and removal. He additionally has immediate physical custody of Petitioner. He is named in his official capacity.

3. Respondent Kristi Noem is the Secretary of the Department of Homeland Security. She is responsible for the implementation and enforcement of the Immigration and Nationality Act (INA), and oversees ICE, which is responsible for Petitioner's detention. Ms. Noem has ultimate custodial authority over Petitioner and is sued in her official capacity.

4. Respondent Department of Homeland Security (DHS) is the federal agency responsible for implementing and enforcing the INA, including the detention and removal of noncitizens.

5. Respondent Pamela Bondi is the Attorney General of the United States. She is responsible for the Department of Justice, of which the Executive Office for Immigration Review and the immigration court system it operates is a component agency. She is sued in her official capacity.

### **JURISDICTION**

6. This action arises under the Constitution of the United States, the Immigration and Nationality Act ("INA"), 8 U.S.C. § 1101 et seq., the regulations implementing the Convention Against Torture ("CAT"), Dec. 10, 1984, S. Treaty

Doc. No. 100-20 (1988), 1465 U.N.T.S. 85; 8 U.S.C. § 1231; and the Administrative Procedure Act (“APA”), 5 U.S.C. § 701 et seq.

7. This Court has subject matter jurisdiction over this Petition pursuant to 28 U.S.C. § 2241, 28 U.S.C. § 1331, and Article I, § 9, cl. 2 of the United States Constitution; the All Writs Act, 28 U.S.C. § 1651; the Administrative Procedure Act, 5 U.S.C. § 701; and for injunctive relief pursuant to the Declaratory Judgment Act, 28 U.S.C. § 2201.

8. Federal district courts have jurisdiction to hear habeas claims by noncitizens challenging the lawfulness or constitutionality of their detention by DHS. *See, e.g., Zadvydas v. Davis*, 533 U.S. 678, 687 (2001). Federal district courts also have jurisdiction to hear “collateral legal and constitutional challenges to the process by which the government seeks to remove [a noncitizen].” *Fatty v. Nielsen*, No. C17-1535-MJP, 2018 WL 3491278, at \*2 (W.D. Wash. Jul. 20, 2018); *see also You v. Nielsen*, 321 F. Supp. 3d 451 (S.D.N.Y. Aug. 2, 2018); *Calderon v. Sessions*, 330 F. Supp. 3d 944, 957-59 (S.D.N.Y. Aug. 1, 2018).

9. The jurisdiction-channeling provisions of the REAL ID Act under 8 U.S.C. § 1252 do not foreclose this Court’s jurisdiction over the Petitioner’s claims. *See De Jesus Martinez v. Neilson*, 341 F.Supp.3d 400 at 407 (D.N.J. Sept. 14, 2018), *appeal docketed*, No. 18-3478 (3d Cir. Nov. 9, 2018) (finding that petitioner “does not bring a challenge to his order of a removal but rather claims he

has the right to engage in [adjudication] before removal” and thus § 1252 does not apply) (emphasis in original)); *Chhoeun v. Marin*, 306 F. Supp. 3d 1147, at 1150, 1159 (C.D. Ca. Jan. 25, 2018) (finding jurisdiction over claim “merely request[ing] that their deportations be delayed...until they can avail themselves of the administrative system that exists to litigate meritorious motions to reopen.”); see also *Reno v. Am.-Arab Anti-Discrimination Comm.*, 525 U.S. 471, 482 (1999) (holding that Section 1252(g) reaches only “three discrete actions that the Attorney General may take: her decision or action to ‘commence proceedings, adjudicate cases, or execute removal orders.’”)

10. A co-equal district court in the Western District of Pennsylvania found itself to have jurisdiction to issue a Temporary Restraining Order enjoining the government from removing a noncitizen detainee with a pending stay of removal before the Board of Immigration Appeals so that the noncitizen detainee could fully adjudicate his immigration case before removal in *Vedam v. Oddo, et al.*, No. 3:25-cv-00383, Dkt. 6 (W.D.Pa Oct. 30, 2025).

11. If Section 1252 did strip jurisdiction from this case, that statute would be unconstitutional as applied to the Petitioner. The Suspension Clause of the U.S. Constitution states “The Privilege of the Writ of Habeas Corpus shall not be suspended, unless when in Cases of Rebellion or Invasion the public Safety may require it.” U.S. Const. art. I, § 9, cl. 2. This protects the right to the writ of habeas

corpus where no adequate or effective alternative remedy exists. See *Boumediene v. Bush*, 553 U.S. 723 (2008).

12. Courts have recently found that the Suspension Clause protects petitioners' rights to habeas relief because of the inadequacy of the motion to reopen process in similar circumstances to the Petitioner's case. See *Compere v. Nielsen*, No. 18-CV-1036-PB, 2019 WL 332193, at \*1 (D.N.H. Jan. 24, 2019); *Devitri v. Cronen*, 289 F. Supp. 3d 294 (D. Mass. Feb. 1, 2018); *Ibrahim v. Acosta*, No. 17-cv-24574, 2018 WL 582520, at \*5-6 (S.D. Fla. Jan. 26, 2018) *Jimenez v. Nielsen*, 334 F.Supp.3d 370, 381-82 (D. Mass. 2018). Other courts have found that it was necessary to apply the canon of constitutional avoidance to avoid ruling on the Suspension Clause issues raised. *S.N.C. v. Sessions*, No. 18 CIV. 7680 (LGS), 2018 WL 6175902, at \*3 (S.D.N.Y. Nov. 26, 2018); *Sied v. Nielson*, No. 17-cv-06785, 2018 WL 1142202, at \*31-67 (N.D. Cal. Mar. 2, 2018).

13. Therefore, this court may properly exercise jurisdiction over Petitioner's claims.

#### VENUE

14. The Middle District of Pennsylvania is the proper venue to resolve Luis's petition for writ of habeas corpus. See 28 U.S.C. § 1391. Luis is now being detained at the Pike County Correctional Facility which is within this District.

15. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 493-500 (1973), venue lies in the United States District Court for the Middle District of Pennsylvania, the judicial district in which Petitioner currently is detained.

16. Petitioner may be detained in an undisclosed location by an unknown custodian, in which case it would be “impossible to apply the immediate custodian and district of confinement rules.” *Rumsfeld v. Padilla*, 542 U.S. 426, 450 n.18, S. Ct. 2711, 159 L. Ed. 2d 513 (2004); *Ozturk v. Hyde*, 136 F.4th 382, 392 (2d Cir. 2025); *Demjanjuk v. Meese*, 784 F.2d 1114, 1115-16, 251 U.S. App. D.C. 310 (D.C. Cir. 1986). In such circumstances, “the naming of a more remote custodian—[such as] the Secretary of Homeland Security—satisfies the statutory requirements.” *Ozturk*, 136 F.4th at 392 (citing *Demjanjuk*, 784 F.2d at 1116); *Khalil v. Joyce*, No. 25-01963, 2025 U.S. Dist. LEXIS 63573, 2025 WL 972959, at \*29-30 (D.N.J. Apr. 1, 2025).

17. Venue is also properly in this Court pursuant to 28 U.S.C. § 1391(e) because Respondents are employees, officers, and agencies of the United States, and because a substantial part of the events or omissions giving rise to the claims occurred in the Middle District of Pennsylvania.

### **EXHAUSTION OF REMEDIES**


18. This Court should not require Petitioner to exhaust his administrative remedies. First, the Supreme Court has recognized that courts should not require exhaustion where there is an unreasonable or indefinite timeframe for administrative action. Exhaustion is thus not appropriate where plaintiff “may suffer irreparable harm if unable to secure immediate judicial consideration of his claim.” *McCarthy v. Madigan*, 503 U.S. 140 at 147 (1992). Petitioner has a constitutionally protected liberty interest in freedom from government custody. *Zadvydas*, 533 U.S. at 690. His unlawful indefinite detention constitutes irreparable harm. *See Seretse-Khama v. Ashcroft*, 215 F. Supp.2d 37, 53 (D.D.C. 2002); *Hardy v. Fischer*, 701 F.Supp. 2d 614, 619 (S.D.N.Y. 2010) (threat of unlawful detention and reimprisonment would constitute quintessential irreparable harm).

19. Moreover, no exhaustion requirement applies to the constitutional claims raised in this Petition because no administrative agency exists to entertain the Petitioner’s constitutional challenges. *See Howell v. INS*, 72 F.3d 288, 291 (2d Cir. 1995); *Arango–Aradondo v. INS*, 13 F.3d 610, 614 (2d Cir. 1994), see also *Matter of C-*, 20 I&N Dec. 529, 532 (BIA 1992) (“it is settled” that the immigration judge and the BIA cannot decide constitutional questions); *Burns v. Cicchi*, 702 F. Supp. 2d 281, 286 (D.N.J. 2010) (excusing further exhaustion where dispositive issues had been predetermined).

20. Additionally, exhaustion is not required where the Petitioner challenges the constitutionality of the agency procedure itself, “such that the question of the adequacy of the administrative remedy is for all practical purposes identical with the merits of the plaintiff’s lawsuit.” *McCarthy*, 503 U.S. at 148 (internal brackets omitted).

### STATEMENT OF FACTS

21. Luis was brought to the U.S. in 2003, as a four-year-old child by his mother, where they settled in Detroit Michigan with his father, who had emigrated three years prior. *See* Declaration of Enma Flores Redondo, attached hereto as Exhibit “C”.

22. The relationship between Luis’s Mother and Father deteriorated. The father,  was violently abusive towards the mother, Enma Flores Redondo. *See Id.*; *see also* Exh. B. at pages 3-4.

23. On September 24, 2004, Luis and his mother were granted voluntary departure by this Court. Luis was unaware of what was happening or of the consequences of failure to depart because he was a toddler. *See* Exh. C.

24. For reasons outside of Luis’s control, Luis’s mother did not comply with the terms of voluntary departure. The terms of Voluntary Departure required Enma to buy plane tickets for herself and Luis to travel to Honduras. Enma could not afford to buy plane tickets, and she could not borrow the money. She reports

that she had to make the difficult choice between buying plane tickets and buying food, and she chose the latter. Luis, being four or five years old, had no control over these circumstances. *Id.*

25. Because the family did not leave within the prescribed time, the voluntary departure order was converted into a removal order.

26. In 2015, Luis applied for, and was granted, Deferred Action through the DACA program. From 2014 to 2016, Luis applied for and received DACA benefits.

27. In 2017, Luis' father took him back to Honduras. Unfortunately, country conditions significantly deteriorated after Luis arrived. *See* Exh. B.

28. This left Luis vulnerable to gang violence. Because they had previously resided in the United States, the gangs believed that the family had money. [REDACTED]

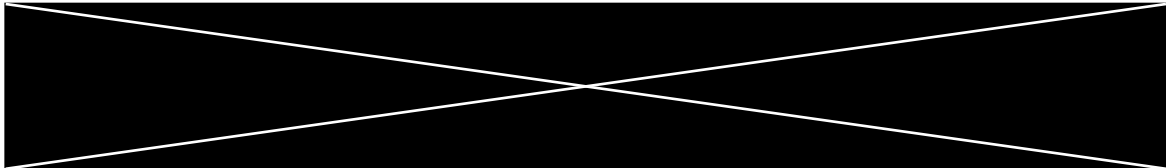
[REDACTED]

[REDACTED] *See* Exh. C at ¶¶

12-13.

29. Because they had previously resided in the United States, the gangs believed that the family had money. [REDACTED]

[REDACTED]



30. In 2021, fearing for his life, Luis returned to the United States by entering without inspection. He was not encountered by DHS at the time of his 2021 entry.

31. Luis is engaged to his partner Daiana Briyith Diaz Quiroz, who is the mother of their U.S. citizen child. Daiana has an approved SIJS with deferred action. With current processing times, it will be approximately a year before she can apply for Legal Permanent Residence, at which point she can file a family-based petition for Luis once they are married.<sup>1</sup>

32. On December 2, 2025, while sitting in his parked car getting ready to go to work, Luis was approached and apprehended by ICE agents who take him into custody. He is currently detained at the Pike County Correctional Facility.

33. On December 8, 2025, Daiana, through counsel, submitted a request for permission to marry Luis to the ICE office with control over the Pike detention center. *See* Exhibit A. Her request was denied because Luis is due to be removed imminently. *Id.*; **ICE Officer Coulter also represented verbally to undersigned**

---

<sup>1</sup> Daiana's I-360 priority date is September 12, 2022. *See* Exhibit C, I-360 Approval with Deferred Action. Based on the December 2025 Visa Bulletin, the current priority date in the relevant (EB4) category is February 15, 2021. *See* <https://travel.state.gov/content/travel/en/legal/visa-law0/visa-bulletin/2026/visa-bulletin-for-december-2025.html>.

**counsel on December 10, 2025 that the removal would likely take place in the next 5-7 days.**

34. Since December 2022, the security landscape in Honduras has undergone a material and fundamental shift with the imposition of a “State of Exception”. This martial-law decree, suspended constitutional rights and empowered the National Police and Military Police of Public Order to conduct mass, arbitrary arrests without warrants.<sup>2</sup>

35. The State of Exception is enforced nationwide, and the police database systems allow security forces to track individuals across departmental lines. The Department of Homeland Security regulations acknowledge that when the persecutor is the government, there is a presumption that internal relocation is not reasonable. 8 C.F.R. § 1208.13(b)(3)(ii).

36. Internal relocation is not only impossible because of police surveillance, but also because of the gangs. Individuals targeted by one gang can not relocate to an area controlled by that same gang. But relocation to a neighborhood controlled by another gang carries with it the presumption that the individual is spying for the first gang.<sup>3</sup>

---

<sup>2</sup> Jared Olson, “How an emergency declaration deepened Honduras's crime crisis” (August 15, 2025), *Al Jazeera*, <https://aje.io/xnafpc>

<sup>3</sup> Marcia Biggs and Julia Galiano-Rios, “Honduran Migrants Deported from the US Often Face a Grim Fate,” (April 1, 2019), *PBS* <https://www.pbs.org/newshour/show/honduran-migrants-deported-from-the-u-s-often-face-a-grim-fate>

37. Recent reports confirm that the Honduran prison system has militarized, with widespread reports of torture, starvation, and extrajudicial execution within detention centers.<sup>4</sup>

38. The Respondent, as a young male deportee, will face a “more likely than not” probability of being arbitrarily detained under the State of Exception. Once in state custody, he would be placed in overcrowded facilities controlled by gangs or corrupt military guards, where the government acquiesces to—or actively participates in—torture. This specific chain of events—profiling, arbitrary arrest, and subsequent torture—is supported by country conditions reports, establishing a clear probability of torture that warrants reopening.

39. Luis is also at risk from the gangs because of his status as a young male deportee. “Although no government tracks the death of deportees, human rights organizations and media reports suggest that deportees to the Northern Triangle countries in Central America are frequently killed upon their return.”<sup>5</sup> Recently deported immigrants are unfamiliar with current country conditions and return to communities that are

---

<sup>4</sup> Amnesty International, “Honduras 2024” <https://www.amnesty.org/en/location/americas/central-america-and-the-caribbean/honduras/report-honduras/>

<sup>5</sup> Elliott Young and Katherine Wackett, “2023 Honduras Country Conditions Bulletin” (2023), *Stanford Migration and Asylum Lab*, <https://migration.stanford.edu/sites/g/files/sbiybj30036/files/media/file/2023-honduras-bulletin.pdf>, at page 23.

controlled by gangs. They are also perceived by gangs as having access to money through personal savings and relatives in the United States. They can be unfamiliar with gang activities and be killed for refusing to comply with gang directives.<sup>6</sup>

40. And there are little to no resources for the recently deported who arrive back in Honduras. Honduras' deputy foreign minister, Antonio Garcia, stated that "There's very little here for deportees." People who return, he said, "are the last to be taken care of."<sup>7</sup>

41. If Luis were to be removed to Honduras, he would face the more-likely-than-not prospect of persecution, torture, or even death.

### LEGAL FRAMEWORK

42. Congress has provided immigrants facing removal with the right to file a single motion to reopen their removal proceedings. 8 U.S.C. §1229a(c)(7). As a general rule, such motions to reopen must be filed within 90 days of entry of a removal order. *Id.* The regulations also provide that the Board of Immigration Appeals may reopen at any time any case in which it has rendered a decision. 8

---

<sup>6</sup> Ivan Espinoza-Madrigal, Patricia Montes, and Oscar Chacon, "Tantamount to a Death Sentence: Deported TPS Recipients Will Experience Extreme Violence and Poverty in Honduras and El Salvador." (July 2018), *Centro Presente, Alianza Americas & Lawyers Committee for Civil Rights and Economic Justice*, <https://lawyersforcivilrights.org/wp-content/uploads/2018/08/Updated-TPS-Delegation-Report-July-2018.pdf>, at page 13.

<sup>7</sup> Megan Janetsky, "As Trump Threatens Mass Deportations, Central America Braces for an Influx of Vulnerable Migrants," (December 16, 2024) *AP News*, <https://apnews.com/article/honduras-trump-mass-deportations-central-america-immigration-c28e71c590a9f3df2d607df13b956656>.

C.F.R. §1003.2(a). The Supreme Court has stated that the right to file a motion to reopen is “an important safeguard intended to ensure a proper and lawful disposition of immigration proceedings.” *Kucana v. Holder*, 558 U.S. 233, 242 (2010) (citations omitted).

43. The filing of a motion to reopen before the Immigration Court does not automatically stay removal. 8 C.F.R. § 1003.23(b)(1)(v). The immigration court generally will not immediately adjudicate a stay motion unless deportation is imminent (i.e., at a maximum, within 3 business days). *See* Immig. Ct. Practice Manual Ch. 8.3(c)(2)(A). Under these circumstances, the Immigration Court may deny a stay but not decide the motion to reopen itself.

44. Individuals can seek judicial review in the U.S. Courts of Appeals of decisions denying motions to reopen. *See Mata v. Lynch*, 135 S.Ct. 2150 (2015); *Kucana*, 558 U.S. 233 (2010). Judicial review in the court of appeals is only available when an order of removal is final and an immigrant may not seek review of a denied stay. 8 U.S.C. §1252(b)(9). An individual whose stay has been denied by the BIA but whose motion to reopen remains pending is unable to seek review of his motion to reopen and is unable to seek a discretionary stay from the court of appeals.

45. Multiple courts have ruled that this legal framework does not provide an adequate alternative to habeas review.

**FIRST CLAIM FOR RELIEF**

46. The Petitioner re-alleges and incorporates by reference the paragraphs above.

47. Petitioner's imminent deportation is unlawful because it deprives him of his right to litigate his motion to reopen, in violation of the Immigration & Nationality Act ("INA") and the Administrative Procedure Act ("APA").

**SECOND CLAIM FOR RELIEF**

48. The Petitioner re-alleges and incorporates by reference the paragraphs above.

49. The Petitioner's imminent deportation is unconstitutional because it deprives him of his liberty interest against deportation and his right to litigate his motion to reopen, in violation of the due process clause.

**PRAYER FOR RELIEF**

WHEREFORE, Petitioner respectfully requests that this court grant the following relief:

- a. Assume jurisdiction over this matter.
- b. Issue a judgement declaring that the deportation of the Petitioner from the United States to Honduras violates the Immigration & Nationality Act and the U.S. Constitution.

- c. Issue an order enjoining Respondents from removing Petitioner until the Detroit Immigration Court has ruled on his motion to reopen and Petitioner has exhausted judicial review of his motion to reopen.
- d. Issue an order requiring Respondents to release Petitioner from custody until his motion to reopen and any judicial review, thereof, have been considered.
- e. Issue an order awarding Petitioner his costs and attorney's fees and costs under the Equal Access to Justice Act, 28 U.S.C. §2412.
- f. Grant any other relief the court deems just and necessary.

Dated: December 11, 2025

Respectfully submitted,

/s/ Karen L. Hoffmann, Esq.

Karen L. Hoffmann, Esquire.

Law Offices of Stanley J. Ellenberg

1500 John F. Kennedy Blvd, Suite 1825

Philadelphia, PA 19102

p. (215) 790-1682

karen@sellenberglaw.com

PA ID #323622

Attorney for Petitioner

**VERIFICATION PURSUANT TO 28 U.S.C. § 2242**

I represent Petitioner and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated: December 11, 2025

*/s/ Karen L. Hoffmann*

Karen L. Hoffmann, Esquire.

Law Offices of Stanley J. Ellenberg

1500 John F. Kennedy Blvd, Suite 1825

Philadelphia, PA 19102

p. (215) 790-1682

karen@sellenberglaw.com

PA ID #323622

Attorney for Petitioner