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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA (Las Vegas)

JOSE ALBERTO GONZALEZ HERNANDEZ,

ALFONSO MARIO RIOS RIOS,

LIDIO LOPEZ LOPEZ

Petitioners,

v.

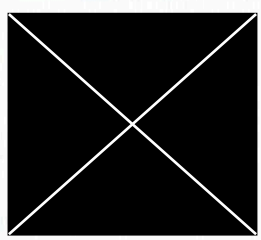
KRISTI NOEM,
in her official capacity as Secretary, U.S. Department of Homeland Security; 245 Murray Lane SW, Washington, DC 20528;

U.S. DEPARTMENT OF HOMELAND SECURITY;

PAMELA J. BONDI,
in her official capacity as Attorney General of the United States, 950 Pennsylvania Avenue, NW, Washington, DC, 20530;

Case No.: _____

Agency No: A#



MOTION FOR TEMPORARY RESTRAINING ORDER

U.S. DEPARTMENT OF JUSTICE;

TODD LYONS,
in his official capacity as Acting Director and Senior Official Performing the Duties of the Director for U.S. Immigration and Customs Enforcement, 500 12th Street, SW, Washington, DC 20536;

BRIAN HENKEY,
in his official capacity as Acting Field Office Director, Salt Lake City Field Office Director, U.S. Immigration & Customs Enforcement, 2975 Decker Lake Drive Suite 100, West Valley City, UT 84119-6096

U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; and

JOHN MATTOS,
in his official capacity as Warden, Nevada Southern Detention Facility, 2190 E. Mesquite Ave. Pahrump, NV 89060

Respondents.

Petitioners, Jose Alberto Gonzalez Hernandez, Alfonso Mario Rios Rios, and Lidio Lopez Lopez ("Petitioners") are presently detained by U.S. Immigration and Customs Enforcement. In accordance with Rule 65 of the Federal Rules of Civil Procedure and the All Writs Act, Petitioners hereby apply for a temporary restraining order or preliminary injunction requiring that Respondents immediately release Petitioners from custody.

Petitioners do not seek ex parte consideration of this Motion. However, because Petitioners are suffering the irreparable harm of continuing detention, they ask that the Court

expeditiously order that their Petition for a Writ of Habeas Corpus be served on Respondents and for expedited briefing and consideration of this Motion.

As set forth in the accompanying Memorandum of Law, Respondents are detaining Petitioners in violation of the Immigration and Nationality Act ("INA") and constitutional due process. Without a restraining order or preliminary injunction ordering that the Immigration Court has jurisdiction under § 1226(a) and ordering Respondents to comply with Immigration Court's alternative bond orders or ordering the Immigration Court to hold bond hearings, Petitioners will suffer irreparable injury by continued unlawful detention.

DATED this 13th day of December, 2025.

Respectfully Submitted,

/s/ Melissa Corral
Melissa Corral
Nevada Bar. No. 14182

/s/ Alissa A. Cooley Yonesawa
Alissa A. Cooley Yonesawa
Nevada Bar. No. 13467

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MEMORANDUM OF LAW IN SUPPORT OF APPLICATION FOR TEMPORARY RESTRAINING ORDER

Petitioners, Jose Alberto Gonzalez Hernandez, Alfonso Mario Rios Rios, and Lidio Lopez Lopez ("Petitioners") respectfully requests this Court's immediate action to secure Petitioners' ability to post bond that the Immigration Court entered in the alternative, after finding it did not have jurisdiction under *Matter of Yajure Hurtado*, or in the alternative, order a bond hearing on the merits within seven (7) days in accordance with the applicable statutes, or alternatively, order Petitioners' immediate release from detention. Petitioners apply for a Temporary Restraining Order, or alternatively, a Preliminary Injunction, for the reasons stated below.

I. INTRODUCTION

1. Petitioners are all longtime residents of the United States. They are all originally from Mexico, but are now in in removal proceedings in Immigration Court, and but for recent changes in policy by the Department of Homeland Security ("DHS") and the Department of Justice ("DOJ"), Las Vegas Immigration Judges ("IJs") would have released them on bond.

2. Normally, Petitioners would be able to request a bond hearing in Immigration Court, and obtain a bond, under the INA and long-standing policy and practice, and as required by 8 U.S.C. § 1226(a). But this year, in violation of the INA, the Board of Immigration Appeals ("BIA") ordered that all individuals who entered the U.S. without inspection (known as "EWIs") are subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A) and are therefore purportedly ineligible for bond. *See Matter of Yajure Hurtado*, 29 I. & N. Dec. 216, 228 (BIA 2025). Respondents' legal interpretation is wrong. As such, Petitioners seek relief from this Court to restore their statutory and constitutional due process right to release on bond.

To be clear, Petitioners do not ask this Court to adjudicate their removability. They merely seek relief from this Court regarding the IJs' jurisdiction to enter bond orders—orders two (2) of the three (3) Petitioners have already received in the alternative and one (1) Petitioner would receive if not for the BIA's decision. All three (3) have demonstrated to the Las Vegas Immigration Court that they pose neither a danger to the community nor a flight risk. Release on bond would allow Petitioners the opportunity to reunite with their family, work and earn income, and access greater resources while pursuing their pending removal proceedings in Immigration Court.

II. FACTS

A. JOSE ALBERTO GONALEZ HERNANDEZ

1. Petitioner Jose Alberto Gonzalez Hernandez s is a 59-year-old resident of Caldell, Idaho. *See* **Exh. A** (Declaration of Jose Alberto Gonzalez Hernandez), at ¶ 1. He is originally from Mexico, but he has lived in the United States for more than thirty (30) years, having last entered the United States in 1994. *Id.*

2. In October 2025, Petitioner was stripped away from his family, job, and community, after multiple federal agencies arrested him without presenting a warrant for his arrest nor explaining the circumstances surrounding his arrest at a legal horse racing event which these agencies raided. *Id.* ¶¶ 5–8; **Exh. B** (Article from Boise State Public Radio, dated October 20, 2025).

3. ICE transferred Petitioner to several locations during the first few days of his custody. **Exh. A** (Declaration of Jose Alberto Gonzalez Hernandez), at ¶ 9. Five (5) days later,

ICE transported him to the Nevada Southern Detention Center ("NSDC") in Pahrump, Nevada, where he has remained ever since. *Id.* ¶ 9.

4. Petitioner does not have a criminal record and has never been in immigration proceedings before. *Id.* ¶ 10. Petitioner's NTA designates him as "an alien present in the United States who has not been admitted or paroled." *See* **Exh. C** (Jose Alberto Gonzalez Hernandez, Notice to Appear ("NTA")).

5. Petitioner has requested a bond hearing on two (2) separate occasions. First, on November 3, 2025, the IJ denied his request due to lack of jurisdiction based on *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025). *See* **Exh. D** (Jose Alberto Gonzalez Hernandez, Order of the IJ, dated November 3, 2025). However, the IJ stated on record that if it was later determined that the IJ had jurisdiction, it would grant bond in the amount of $1,500. *See* **Exh. E** (Declaration of Chantell Abou-Hamdan, Esq.). Second, Petitioner refiled his bond motion due to the declaratory judgment issued in the *Bautista v. Noem*, 5:25-cv-01873-SSS-BFM (C.D. Cal.). But the IJ again denied Petitioner's request for lack of jurisdiction, declining to follow the declaratory judgment in *Bautista*. *See* **Exh. F** (Jose Alberto Gonzalez Hernandez, Order of the IJ, dated December 1, 2025).

6. These orders are a clear violation of both the INA and the Due Process Clause of the United States Constitution and for these reasons Petitioner files the instant motion.

B. ALFONSO MARIO RIOS RIOS

7. Petitioner Alfonso Mario Rios Rios is a 62-year-old resident of Las Vegas, Nevada. *See* **Exh. G** (Declaration of Alfonso Mario Rios Rios), at ¶ 1. He is originally from

Mexico, but he has lived in the United States for almost twenty (20) years, having last entered the United States in 2006. *Id.*

8. In October 2025, Petitioner was stripped away from his family, job, and community, after multiple federal agencies arrested him without presenting a warrant for his arrest early in the morning while he drove from his home to his job. *Id.* ¶¶ 8–9; *see also* **Exh. H** (Alfonso Mario Rios Rios, I-213).

9. Petitioner transported Petitioner to the Las Vegas Enforcement and Removal Operations ("ERO") office and after a few hours, transferred him to the NSDC in Pahrump, Nevada, where he has remained ever since. **Exh. G** (Declaration of Alfonso Mario Rios Rios), at ¶ 10.

10. Petitioner does not have a criminal record and has never been in immigration proceedings before. *Id.* ¶¶ 4, 7. Petitioner's NTA designates him as "an alien present in the United States who has not been admitted or paroled." *See* **Exh. I** (Alfonso Mario Rios Rios, NTA).

11. Petitioner requested a bond hearing from the IJ. On December 12, 2025, the IJ denied his request due to lack of jurisdiction based on *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025). *See* **Exh. J** (Alfonso Mario Rios Rios, Order of the IJ, dated December 12, 2025). However, the IJ did issue an "in the alternative" decision, setting Petitioner's bond at the minimum of $1,500.00. *Id.* DHS waived appeal, indicating it agreed with the IJ's determination regarding dangerousness and flight risk. *Id.*

12. The IJ's order stating it lacks jurisdiction is a clear violation of both the INA and the Due Process Clause of the United States Constitution and for these reasons Petitioner files the instant motion.

13. The IJ's order stating it lacks jurisdiction is a clear violation of both the INA and the Due Process Clause of the United States Constitution and for these reasons Petitioner files the instant motion.

C. LIDIO LOPEZ LOPEZ

14. Petitioner Lidio Lopez Lopez is a 50-year-old resident of Las Vegas, Nevada. *See* **Exh. K** (Lidio Lopez Lopez, NTA). He is originally from Mexico, but he has lived in the United States for thirty-five (35) years, having last entered the United States in 1990. *See* **Exh. L** (Declaration of Lidio Lopez Lopez), at ¶ 1. He has eight (8) U.S. citizen children with his wife of twenty-four (24) years, Bertha. *Id.* His eldest is twenty-three (23) while his youngest is five (5) and was born with Noonan Symdrome, causing a congenital heart defect and other symptoms. *Id.* ¶ 4. Petitioner is the primary financial provider for his household of ten. *Id.* ¶¶ 1–4.

15. On November 4, 2025, Petitioner was on his way to work at 5:00AM when five ICE agents in three (3) vehicles pulled him over. *Id.* ¶ 5. One (1) officer claimed the reason was Petitioner had been speeding and asked Petitioner where he was going. *Id.* ICE transferred Petitioner to the Las Vegas ERO office for processing before ultimately transferring him to NSDC in Pahrump, Nevada, where he has been held since. *Id.*

16. Petitioner's NTA designates him as "an alien present in the United States who has not been admitted or paroled." *See* **Exh. K** (Lidio Lopez Lopez, Partial NTA, page 1 of 4).

Petitioner has one criminal conviction which occurred on May 1, 2024, for low level possession of controlled substance. *See* **Exh. L** (Declaration of Lidio Lopez Lopez), at ¶ 7; *see also* **Exh. M** (Lidio Lopez Lopez, Judgment of Conviction). This conviction does not render him subject to mandatory detention under INA ¶ 236(c), as the Nevada statute is overbroad and divisible by substance, and upon review of the record of conviction, the substance for which he was convicted of possessing is not listed in the federal Controlled Substances Act. *See* **Exh. N** (Lidio Lopez Lopez, Guilty Plea Agreement and Second Amended Indictment), at 58–59.

17. On November 30, 2025, Petitioner requested a bond hearing due to the declaratory judgment issued in the *Bautista v. Noem*, 5:25-cv-01873-SSS-BFM (C.D. Cal.). On December 12, 2025, the IJ denied his request due to lack of jurisdiction based on *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025). *See* **Exh. O** (Lidio Lopez Lopez, Order of the IJ, dated December 12, 2025). However, the IJ entered an alternative order granting bond at $3,000, in the event he pursued habeas relief with this Court, or in the event the district court in *Bautista v. Noem* entered a clarifying order regarding the effect and consequence of the partial order granting summary judgment. *Id.*

18. The IJ's order stating it lacks jurisdiction is a clear violation of both the INA and the Due Process Clause of the United States Constitution and for these reasons Petitioner files the instant petition.

III. LEGAL STANDARDS FOR A TRO/PRELIMINARY INJUNCTION

Under Federal Rule of Civil Procedure 65, a court may grant a preliminary injunction to prevent "immediate and irreparable injury." Fed. R. Civ. P. 65(b). A preliminary injunction is "an extraordinary remedy that may only be awarded upon a clear showing that the plaintiff is

entitled to such relief." *Winter v. Natural Res. Def. Council, Inc.*, 555 U.S. 7, 22 (2008). The standard for obtaining a TRO and a preliminary injunction is the same. *Quiroga v. Chen*, 735 F. Supp. 2d 1226, 1228 (D. Nev. 2010).

To obtain a TRO or preliminary injunction, a plaintiff must establish the following *Winter* factors: (1) a likelihood of success on the merits; (2) that the plaintiff will likely suffer irreparable harm in the absence of preliminary relief; (3) that the balance of equities tips in its favor; and (4) that the public interest favors an injunction. *Winter v. Natural Res. Def. Council*, Inc., 555 U.S. 7, 22 (2008). When the government is the defendant, "the balance of the equities and public interest factors merge." *Id.* (citing *Drakes Bay Oyster Co. v. Jewell*, 747 F.3d 1073, 1092 (9th Cir. 2014)). Consequently, even if Plaintiff raises only "serious questions" as to the merits of his claims, the court can grant relief if the balance of hardships tips "sharply" in Plaintiff's favor, and the remaining equitable factors are satisfied. *All. for the Wild Rockies*, 632 F.3d at 1135.

This Court should grant Petitioners' application for a TRO, or in the alternative, a preliminary injunction, because the four factors concerning whether to grant a TRO or preliminary injunction weigh heavily in Petitioners' favor. The most important factor—Petitioners' likelihood of success on the merits—is particularly strong due to well-settled precedent, statutory interpretation, and constitutional guarantees all favoring Petitioners.

IV. ARGUMENT

A. Petitioners Are Not Required to Exhaust Administrative Remedies Before Filing this Habeas Corpus Petition.

As a threshold matter, Petitioners are permitted to file the instant habeas corpus petition. Neither 8 U.S.C. § 2241 nor any relevant provision of the INA requires the exhaustion of

administrative remedies before filing such petition. *Laing v. Ashcroft*, 370 F.3d 994, 998 (9th Cir. 2004) (citing *Castro-Cortez v. INS*, 239 F.3d 1037, 1047 (9th Cir. 2001)). And while courts may require administrative exhaustion as a prudential matter, such discretion applies only when the following factors are met:

> (1) agency expertise makes agency consideration necessary to generate a proper record and reach a proper decision;
> (2) relaxation of this requirement would encourage the deliberate bypass of the administrative scheme; and
> (3) administrative review is likely to allow the agency to correct its own mistakes and to preclude the need for judicial review.

Puga v. Chertoff, 488 F.3d 812, 815 (9th Cir. 2007). If any of these factors are not satisfied, then courts may not require administrative exhaustion.

Courts may waive administrative exhaustion if a petitioner demonstrates at least one of the following elements:

> (1) administrative remedies are inadequate or not efficacious;
> (2) the pursuit of administrative remedies would be a futile gesture;
> (3) irreparable injury will result; or
> (4) the administrative proceedings would be void.

Laing, 370 F.3d at 1000; *see Ortega-Rangel v. Sessions*, 313 F.Supp. 3d 993, 1003 (9th Cir. 2018).

Here, the *Puga* factors weigh against requiring administrative exhaustion. ***First***, the legal questions raised—namely, the proper interpretation of §§ 1225 and 1226 of the INA, and the constitutionality of § 1226(c) as applied to Petitioners—are purely legal and require no agency expertise. Courts are primarily responsible for resolving such questions, not agencies. *See Loper Bright Enters. v. Raimondo*, 603 U.S. 369, 385 (2024).

Second, there is no risk of bypassing agency procedures because Petitioners have no available relief in immigration court. The BIA has already adopted DHS' interpretation of the INA—which subjects EWIs to mandatory detention under § 1225(b)—in *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216, 228 (BIA 2025). As a result, IJs no longer have the authority to hold bond hearings for EWIs. *See* 8 C.F.R. § 1003.1(d) (describing the BIA's power to issue precedent decisions); 8 C.F.R. § 1003.10(d) ("[i]mmigration judges shall be governed by . . . the decisions of the Board"). Accordingly, Petitioners' only avenue for relief lies with this Court. Because the writ of habeas corpus is the appropriate mechanism for challenging the legality of custody, and because this Court has jurisdiction over "constitutional claims or questions of law" related to immigration detention, Petitioners' claims are properly before this Court, and there is no risk of Petitioners bypassing agency procedures. *See Dep't of Homeland Sec. v. Thuraissigian*, 591 U.S. 103 (2020).

Third, administrative review would not result in the agency correcting its mistake, as the BIA has clearly established its position on the matter. On July 8, 2025, DHS issued new "Interim Guidance"[1] that states: "[t]his message serves as notice that DHS, in coordination with the DOJ, has revisited its legal position on detention and release authorities." Subsequently, on September 5, 2025, the BIA adopted this position with the published opinion of *Matter of Yajure Hurtado*. 29 I. & N. Dec. 216 (BIA 2025).

The waiver of administrative exhaustion in this case is appropriate. This Court recently granted such a waiver in an analogous case on September 17, 2025. *Vazquez v. Feeley*, No.

[1] *Available at* https://www.aila.org/ice-memo-interim-guidance-regarding-detention-authority-for-applications-for-admission (last accessed December 13, 2025).

2:25-CV-01542-RFB-EJY, 2025 WL 2676082 (D. Nev. Sep. 17, 2025). There, the petitioner likewise challenged DHS's mandatory detention policy in a habeas petition and sought preliminary injunction. *Id.* This Court found that requiring administrative exhaustion would be futile for three reasons: ***First***, the petitioner's constitutional claims fell beyond the scope of BIA's jurisdiction. *See Matter of G.K.*, 26 I. & N. Dec. 88, 96–97 (BIA 2013) (explaining that "[n]either the [BIA] nor the IJ have the authority to rule on the constitutionality of the statutes we administer[.]") ***Second***, the BIA had already adopted DHS' new interpretation of the INA, making the outcome of administrative review a foregone conclusion. *See Vasquez-Rodriguez v. Garland*, 7 F.4th 888, 896 (9th Cir. 2021) ("[w]e will excuse a failure to exhaust if it is very likely what [the BIA's] result would have been. Thus, where the agency's position appears already set and recourse to administrative remedies is very likely futile, exhaustion is not required."). ***Lastly***, to subject Petitioners to unconstitutional detention while awaiting a BIA decision or conclusion of their immigration proceedings would result in irreparable harm. *See Rodriquez v. Robbins*, 715 F.3d 1127, 1145 (9th Cir. 2013) (finding irreparable harm in continued detention of noncitizens who would likely be granted conditional release if afforded a bond hearing).

Given the factual and legal parallels between *Vazquez v. Feeley* and the instant case, this Court's conclusion—that a petitioner challenging their detention under § 1225 and seeking a preliminary injunction is not required to exhaust administrative remedies, and that waiver of the exhaustion requirement is appropriate—applies with full force here.

B. Petitioners Are Likely to Succeed on the Merits.

Whether Petitioners satisfy the first *Winter* factor—the likelihood of success on the

merits—is the most important factor in a preliminary injunction analysis, and is especially important where a plaintiff seeks such relief due to an alleged constitutional violation. *Chamber of Comm.*, 62 F.4th at 481 (quoting *California ex rel. Becerra v. Azar*, 950 F.3d 1067, 1083 (9th Cir. 2020) (en banc)); *Baird v. Bonta*, 81 F.4th 1036 1042 (9th Cir. 2023).

Here, Petitioners challenge their detention on two grounds: (1) they are detained pursuant to § 1226, not § 1225, because they were already present in the United States at the time of their arrests and therefore are not applicants for admission and thus entitled to bond under § 1226; and (2) subjecting them to mandatory detention under § 1226(c) violates due process, as the basis for detention rests solely on the fact they entered without inspection.

1. First, Petitioners are subject to 8 U.S.C. § 1226, not § 1225, because DHS designated them as "present in the United States," rather than an applicant for admission at the border.

The Immigration and Nationality Act ("INA"), codified at Title 8 of the United States Code, governs the detention of noncitizens in removal proceedings. *See* 8 U.S.C. § 1229a. There are two (2) basic forms of detention: mandatory detention under §§ 1225(b)(1), 1225(b)(2), and 1226(c), and discretionary detention under § 1226(a). The first issue is whether Petitioners' detention is governed by § 1225 or § 1226.

Section 1225 applies only in two (2) narrow circumstances: (1) where a noncitizen is subject to expedited removal under § 1225(b)(1); or (2) where, after inspection, an immigration officer determines that a noncitizen is an "applicant for admission" who is "not clearly and beyond a doubt entitled to be admitted." *See, e.g.*, *Benitez*, 2025 WL 2371588, at *5 (quoting *Martinez v. Hyde*, Civil Action No. 25-11613-BEM, --- F. Supp. 3d ---, 2025 WL 2084238, at *2 (D. Mass. July 24, 2025)); 8 U.S.C. § 1225(b)(2)(A). The Supreme Court has made clear that this process

"generally begins at the Nation's borders and ports of entry." *Jennings v. Rodriguez*, 583 U.S. 281, 287 (2018). By contrast, § 1226 governs the detention of noncitizens who are already "inside the United States" or "present in the country." *See Jennings v. Rodriguez*, 583 U.S. at 288-89.

After Congress enacted § 1225(b)(2) as part of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, the EOIR drafted new regulations explaining that, in general, people who entered the country without inspection were not considered detained under § 1225 and that they were instead detained under § 1226(a). Pub. L. No. 104-–208, Div. C, §§ 302–03, 110 Stat. 3009-546, 3009–582 to 3009–583, 3009–585; *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). Thus, in the decades that followed, most EWIs were placed in standard removal proceedings and received bond hearings, unless their criminal history rendered them ineligible. This practice was consistent with many more decades of practice, in which noncitizens who were not deemed "arriving" were entitled to a bond hearing before an IJ. *See* 8 U.S.C. § 1252(a) (1994); *see also* H.R. Rep. No. 104-469, pt. 1, at 229 (1996) (noting that § 1226(a) simply "restates" the detention authority previously found at § 1252(a)).

Despite this longstanding practice, in July 2025, the DHS and DOJ adopted a new policy asserting that § 1226 does not apply to EWIs, and that such individuals must instead be detained under § 1225—rendering them categorically ineligible for bond.[2] On September 5, 2025, the Board of Immigration Appeals ("BIA") affirmed this broad interpretation in *Matter of Yajure Hurtado*. 29 I. & N. Dec. 216 (BIA 2025). This abrupt shift, however, reflects a clear

[2] *Available at* https://www.aila.org/ice-memo-interim-guidance-regarding-detention-authority-for-applications-for-admission (last accessed December 13, 2025).

misreading of the INA, as it departs from decades of agency practice, is contradicted by recent judicial interpretations of the relevant statutes, and undermines foundational principles of statutory construction.

a. Several district courts, including multiple in the Ninth Circuit, agree that § 1226 applies.

Throughout the country, more than a hundred cases in district courts, with many being in the Ninth Circuit, have addressed the question presented here and have reached the same

conclusion: § 1226 applies to EWIs who are apprehended by ICE while present in the United States.[3] [4]

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[3] Decisions issued by courts within the jurisdiction of the United States Court of Appeals for the Ninth Circuit include: *Herrera v. Knight*, No. 2:25-CV-01366-RFB-DJA, 2025 WL 2581792 (D. Nev. Sept. 5, 2025); *Vazquez v. Feeley*, No. 2:25-CV-01542-RFB-EJY, 2025 WL 2676082 (D. Nev. Sept. 17, 2025); *Roman v. Noem*, No. 2:25-CV-01684-RFB-EJY, 2025 WL 2710211 (D. Nev. Sept. 23, 2025); *Carlos v. Noem*, No. 2:25-CV-01900-RFB-EJY, 2025 WL 2896156 (D. Nev. Oct. 10, 2025); *E.C. v. Noem*, No. 2:25-CV-01789-RFB-BNW, 2025 WL 2916264 (D. Nev. Oct. 14, 2025); *Perez Sanchez v. Bernacke*, No. 2:25-CV-01921-RFB-MDC (D. Nev. Oct. 17, 2025); *Aparicio v. Noem*, No. 2:25-CV-01919-RFB-DJA, 2025 WL 2998098 (D. Nev. Oct. 23, 2025); *Dominguez-Lara v. Noem*, No. 2:25-CV-01553-RFB-EJY, 2025 WL 2998094 (D. Nev. Oct. 24, 2025); *Bautista-Avalos v. Bernacke*, 2:25-CV-01987-RFB-BNW (D. Nev. Oct 27, 2025); *Arce-Cervera v. Noem*, No. 2:25-CV-01895-RFB-NJK, 2025 WL 3017866 (D. Nev. Oct. 28, 2025); *Alvarado Gonzalez v. Mattos*, No. 2:25-CV-01599-RFB-NJK (D. Nev. Oct. 30, 2025); *Rodriguez Cabrera v. Mattos*, No. 2:25-cv-01551-RFB-EJY (D. Nev. Nov. 3, 2025); *Berto Mendez v. Noem*, No. 2:25-cv-02062-RFB-MDC, 2025 WL 3124285 (D. Nev. Nov. 7, 2025); *Zaragoza Mosqueda v. Noem*, No. 5:25-CV-02304 CAS (BFM), 2025 WL 2591530 (C.D. Cal. Sept. 8, 2025); *Cuevas Guzman v. Andrews*, No. 1:25-CV-01015-KES-SKO (HC), 2025 WL 2617256 (E.D. Cal. Sept. 9, 2025); *Salcedo Aceros v. Kaiser*, No. 25-CV-06924-EMC (EMC), 2025 WL 2637503 (N.D. Cal. Sept. 12, 2025); *Oliveros v. Kaiser*, No. 25-CV-07117-BLF, 2025 WL 2677125 (N.D. Cal. Sept. 18, 2025); *Lepe v. Andrews*, --- F. Supp. 3d ---, 2025 WL 2716910 (E.D. Cal. Sept. 23, 2025); *Roa v. Albarran*, No. 25-CV-07802, 2025 WL 2732923 (N.D. Cal. Sept. 25, 2025); *Valencia Zapata v. Kaiser*, --- F. Supp. 3d ---, 2025 WL 2741654 (N.D. Cal. Sept. 26, 2025); *Santiago Flores v. Noem*, No. 5:25-cv-02490-AB-AJR, 2025 WL 3050062 (C.D. Cal. Sept. 29, 2025); *Cordero Pelico v. Kaiser*, No. 25-CV-07286, 2025 WL 2822876 (N.D. Cal. Oct. 3, 2025); *Echevarria v. Bondi*, No. 25-CV-03252, 2025 WL 2821282 (D. Ariz. Oct. 3, 2025); *Alvarenga Matute v. Wofford*, No. 25-CV-01206, 2025 WL 2817795 (E.D. Cal. Oct. 3, 2025); *Ortiz Donis v. Chestnut*, No. 1:25-CV-01228 JLT SAB, 2025 WL 2879514 (E.D. Cal. Oct. 9, 2025); *Alvarez Chavez v. Kaiser*, No. 3:25-cv-06984-LB, 2025 WL 2909526 (N.D. Cal. Oct. 9, 2025); *Garcia v. Noem*, No. 5:25-CV-02771-ODW (PDX), 2025 WL 2986672 (C.D. Cal. Oct. 22, 2025); *Equivel-Ipina v. Larose*, No. 25-CV-2672 JLS (BLM), 2025 WL 2998361 (S.D. Cal. Oct. 24, 2025); *J.A.C.P. v. Wofford*, No. 1:25-CV-01354-KES-SKO (HC), 2025 WL 3013328 (E.D. Cal. Oct. 27, 2025); *Ruiz Yarleque v. Noem*, No. 5:25-CV-02836-MEMF-SP, 2025 WL 3043936, (C.D. Cal. Oct. 31, 2025); *Beltran v. Noem*, No. 25CV2650-LL-DEB, 2025 WL 3078837 (S.D. Cal. Nov. 4, 2025); *Menjivar Sanchez v. Wofford*, No. 1:25-CV-01187-SKO (HC), 2025 WL 3089712 (E.D. Cal. Nov. 5, 2025); *Zaragoza v. Noem*, 5:25-cv-2925-HDV-PVC (C.D. Cal. Nov. 7, 2025) (Dkt. 8); *Otilio B.F. v. Andrews*, 1:25-cv-01398-KES-EPG (HC), -- F. Supp. 3d ----, 2025 WL 3152480 (E.D. Cal. Nov. 11, 2025); *Sharan S. v. Chestnut*, No. 1:25-CV-01427-KES-SKO (HC), 2025 WL 3167826 (E.D. Cal. Nov. 12, 2025); *Moran Bernal v. Noem*, No. 5:25-cv-2995-CV-SSC (C.D. Cal. Nov. 12, 2025) (Dkt. 9); *Pelico Calel v. Larose*, No. 3:25-CV-02883-GPC-JLB, 2025 WL 3171898 (S.D. Cal. Nov. 13, 2025); *Maravilla Amaya*

v. Noem, No. 25CV2892-BTM-DEB, 2025 WL 3182998 (S.D. Cal. Nov. 13, 2025); *Estuardo Marin v. Andrews*, No. 1:25-CV-01422-SAB-HC, 2025 WL 3171484 (E.D. Cal. Nov. 13, 2025).

[4] Decisions issued by district courts nationwide include: *Sampiao v. Hyde*, No. 1:25-CV-11981-JEK, 2025 WL 2607924 (D. Mass. Sept. 9, 2025); *Hernandez Marcelo v. Trump*, --- F. Supp. 3d ----, 2025 WL 2741230 (S.D. Iowa Sept. 10, 2025); *Lopez Santos v. Noem,* No. 3:25-CV-01193, 2025 WL 2642278 (W.D. La. Sept. 11, 2025); *Garcia Cortes v. Noem*, No. 1:25-CV-02677-CNS, 2025 WL 2652880 (D. Colo. Sept. 16, 2025); *Salazar v. Dedos*, No. 1:25-CV-00835-DHU-JMR, 2025 WL 2676729 (D.N.M. Sept. 17, 2025); *Beltran Barrera v. Tindall*, No. 3:25-CV-541-RGJ, 2025 WL 2690565 (W.D. Ky. Sept. 19, 2025); *Hasan v. Crawford,* No. 1:25-CV-1408 (LMB/IDD), 2025 WL 2682255 (E.D. Va. Sept. 19, 2025); *Chogllo Chafla v. Scott*, No. 25-CV-00437, 2025 WL 2688541 (D. Me. Sept. 22, 2025); *Singh v. Lewis*, No. 25-CV-96, 2025 WL 2699219 (W.D. Ky. Sept. 22, 2025); *Giron Reyes v. Lyons*, --- F. Supp. 3d ---, 2025 WL 2712427 (N.D. Iowa Sept. 23, 2025); *Brito Barrajas v. Noem*, No. 25-CV-00322, 2025 WL 2717650 (S.D. Iowa Sept. 23, 2025); *Lopez v. Hardin*, No. 25-CV-830, 2025 WL 2732717 (M.D. Fla. Sept. 25, 2025); *Rivera Zumba v. Bondi*, No. 25-CV-14626, 2025 WL 2753496 (D.N.J. Sept. 26, 2025); *Inlago Tocagon v. Moniz*, --- F. Supp. 3d ---, 2025 WL 2778023 (D. Mass. Sept. 29, 2025); *Romero-Nolasco v. McDonald*, --- F. Supp. 3d ---, 2025 WL 2778036 (D. Mass. Sept. 29, 2025); *Chang Barrios v. Shepley*, No. 25-CV-00406, 2025 WL 2772579 (D. Me. Sept. 29, 2025); *Alves da Silva v. ICE*, No. 25-CV-284, 2025 WL 2778083 (D.N.H. Sept. 29, 2025); *J.U. v. Maldonado*, No. 25-CV-04836, 2025 WL 2772765 (E.D.N.Y. Sept. 29, 2025); *Quispe v. Crawford,* No. 25-CV-1471, 2025 WL 2783799 (E.D. Va. Sept. 29, 2025); *Chiliquinga Yumbillo v. Stamper*, No. 25-CV-00479, 2025 WL 2783642 (D. Me. Sept. 30, 2025); *Morales v. Plymouth Cnty. Corr. Facility*, No. 25-CV-12602 (D. Mass. Sept. 30, 2025) (Dkt. 15); *Santiago Helbrum v. Williams*, No. 4:25-cv-00349-SHL-SBJ, 2025 WL 2840273 (S.D. Iowa Sept. 30, 2025); *Quispe-Ardiles v. Noem*, No. 25-CV-01382, 2025 WL 2783800 (E.D. Va. Sept. 30, 2025); *Esmeralda Mendoza v. Hyde*, No. 25-12815-JEK (D. Mass. Oct. 1, 2025) (Dkt. 12); *Chavez Chavez v. Hyde*, No. 25-12571-JEK (D. Mass. Oct. 1, 2025) (Dkt. 11); *De Oliveira Gomes v. Hyde*, No. 25-12737-JEK (D. Mass. Oct. 1, 2025) (Dkt. 8); *Reynosa Tejada v. Moniz*, No. 1:25-cv-12731-LTS (D. Mass. Oct. 1, 2025) (Dkt. 10); *D.S. v. Bondi*, No. 25-CV-3682, 2025 WL 2802947 (D. Minn. Oct. 1, 2025); *De Miranda Silva v. Hyde*, No. 25-12679-ADB (D. Mass. Oct. 2, 2025) (Dkt. 9); *De Sousa v. Hyde*, No. 25-12736-BEM (D. Mass. Oct. 2, 2025) (Dkt. 8); *Goncalves Xavier v. Moniz*, No. 25-12798-JEK (D. Mass. Oct. 2, 2025) (Dkt. 14); *Rocha v. Hyde*, No. 25-CV-12584, 2025 WL 2807692 (D. Mass. Oct. 2, 2025); *Chanaguano Caiza v. Scott*, No. 25-CV-00500, 2025 WL 2806416 (D. Me. Oct. 2, 2025); *Moreira Neto v. FCI Berlin, Warden*, No. 25-311-JL-TSM (D.N.H. Oct. 2, 2025) (Dkt. 14); *Ayala Casun v. Hyde*, No. 25-CV-427, 2025 WL 2806769 (D.R.I. Oct. 2, 2025); *Guzman Alfaro v. Wamsley,* No. 25-CV-01706, 2025 WL 2822113 (W.D. Wash. Oct. 2, 2025); *Escobar v. Hyde*, No. 25-CV-12620, 2025 WL 2823324 (D. Mass. Oct. 3, 2025); *Martins Valadares v. Hyde*, No. 1:25-cv-12693-ADB (D. Mass. Oct. 3, 2025) (Dkt. 8); *Ribeiro Da Silva v. Hyde*, No. 1:25-cv-12756-JEK (D. Mass. Oct. 3, 2025) (Dkt. 9); *Shinwari v. Hyde*, No. 1:25-cv-12021-LTS (D. Mass. Oct. 3, 2025 (Dkt. 37); *Artiga v. Genalo*, No. 25-CV-5208, 2025 WL 2829434 (E.D.N.Y. Oct. 5, 2025); *Diaz Dimas et al. v. Moniz,* No. 1:25-cv-12665-LTS (D. Mass. Oct. 6, 2025) (Dkt. 14); *Pereira De Souza v. Hyde*, No. 1:25-cv-12532-RGS (D. Mass. Oct. 6, 2025) (Dkt. 13); *Velasco-Luis v. Hyde*, No. 1:25-cv-12747-RGS (D.

Mass. Oct. 6, 2025) (Dkt. 8); *Hyppolite v. Noem*, No. 25-CV-4304, 2025 WL 2829511 (E.D.N.Y. Oct. 6, 2025); *Cardoso De Sa v. Hyde*, No. 1:25-cv-12788-RGS (D. Mass. Oct. 7, 2025) (Dkt. 9); *Cardoso Dos Santos v. Hyde*, No. 1:25-cv-12787-RGS (D. Mass. Oct. 7, 2025) (Dkt. 7); *Carmona Reyes v. Hyde*, No. 1:25-cv-12781-RGS (D. Mass. Oct. 7, 2025) (Dkt. 8); *Da Silva v. Hyde*, No. 1:25-cv-12638-IT (D. Mass. Oct. 7, 2025) (Dkt. 10); *Fonseca De Sa v. Hyde*, No. 1:25-cv-12734-ADB (D. Mass. Oct. 7, 2025) (Dkt. 8); *S.D.B.B. v. Johnson*, No. 1:25-CV-882, 2025 WL 2845170 (M.D.N.C. Oct. 7, 2025); *Buenrostro-Mendez v. Bondi*, No. 4:25-cv-03726 (S.D. Tex. Oct. 7, 2025) (Dkt. 18); *Goncalves Bento et al. v. Moniz*, No. 1:25-cv-12498-RGS (D. Mass. Oct. 8, 2025) (Dkt. 8); *Eliseo A.A. v. Olson*, No. CV 25-3381 (JWB/DJF), 2025 WL 2886729 (D. Minn. Oct. 8, 2025); *Padron Covarrubias v. Vergara*, No. 5:25-cv-00112, 2025 WL 2950097 (S.D. Tex. Oct. 8, 2025); *Lopez Lopez v. Hyde*, No. 1:25-cv-12725-IT (D. Mass. Oct. 8, 2025) (Dkt. 14); De Los *Reyes Gonzalez v. McDonald*, No. 1:25-cv-12644-RGS (D. Mass. Oct. 9, 2025) (Dkt. 10); *Pereira v. Hyde*, No. 1:25-cv-12775-ADB (D. Mass. Oct. 9, 2025) (Dkt. 8); *Rosa Venancio v. Hyde*, No. 1:25-cv-12616-IT (D. Mass. Oct. 9, 2025) (Dkt. 12); *Seidu v. Moniz*, No. 1:25-cv-12723-BEM (D. Mass. Oct. 9, 2025) (Dkt. 11); *Tawela v. Wesling*, No. 1:25-cv-12794-AK (D. Mass. Oct. 9, 2025) (Dkt. 11); *Vasconcelos De Castro v. Hyde*, No. 1:25-cv-12785-AK (D. Mass. Oct. 9, 2025) (Dkt. 13); *Landaverde v. Hyde*, No. 1:25-cv-12552-MJJ (D. Mass. Oct. 10, 2025) (Dkt. 16); *Lopez Orellana v. Moniz*, No. 1:25-cv-12908-PBS (D. Mass. Oct. 10, 2025) (Dkt. 12); *Monzon Guzman v. Hyde*, No. 1:25-cv-12593-MJJ (D. Mass. Oct. 10, 2025) (Dkt. 14); *Orellana-Serrano v. Hyde*, No. 1:25-cv-12646-MJJ (D. Mass. Oct. 10, 2025) (Dkt. 18); *Castillo v. Lyons*, No. 25-CV-16219 (MEF), 2025 WL 2940990 (D.N.J. Oct. 10, 2025); *Alejandro v. Olson*, No. 1:25-CV-02027-JPH-MKK, 2025 WL 2896348 (S.D. Ind. Oct. 11, 2025); *Singh v. Lyons*, No. 1:25-CV-01606-AJT-WBP, 2025 WL 2932635 (E.D. Va. Oct. 14, 2025); *Merino v. Ripa*, No. 25-23845-CIV, 2025 WL 2941609 (S.D. Fla. Oct. 15, 2025); *Puga v. Assistant Field Off. Dir., Krome N. Serv. Processing Ctr.*, No. 25-24535-CIV, 2025 WL 2938369 (S.D. Fla. Oct. 15, 2025); *Ochoa v. Noem*, No. 25 CV 10865, 2025 WL 2938779 (N.D. Ill. Oct. 16, 2025); *Andrade Hernandez v. Moniz*, No. 25-12860-ADB (D. Mass. Oct. 16, 2025) (Dkt. 8); *Cruz Avalos v. Moniz*, No. 25-12940-BEM (D. Mass. Oct. 16, 2025) (Dkt. 8); Chavez Mendoza v. Moniz, No. 25-12978-PBS (D. Mass. Oct. 16, 2025) (Dkt. 13); *Dume Rivera v. Moniz*, No. 25-12833-FDS (D. Mass. Oct. 16, 2025) (Dkt. 12); *Garcia Liranzo v. Moniz*, No. 25-12930-BEM (D. Mass. Oct. 16, 2025) (Dkt. 11); *Pineda-Chavez v. Moniz,* No. 25-12932-MJJ (D. Mass. Oct. 16, 2025) (Dkt. 9); *Zacarias-Sanchez v. Moniz*, No. 25-12915-BEM (D. Mass. Oct. 16, 2025) (Dkt. 9); *Pérez Piña v. Stamper,* No. 2:25-cv-00509-SDN (D. Me. Oct. 16, 2025) (Dkt. 20); *Hernandez v. Crawford*, No. 1:25-CV-01565-AJT-WBP, 2025 WL 2940702 (E.D. Va. Oct. 16, 2025); *Menjivar Sanchez v. Wofford,* No. 1:25-CV-01187-SKO (HC), 2025 WL 2959274 (E.D. Cal. Oct. 17, 2025); *Garcia Guaman v. Hyde*, No. 25-12879-ADB (D. Mass. Oct. 17, 2025) (Dkt. 7); *Nogueira Da Silva v. Hyde*, No. 25-12931-LTS (D. Mass. Oct. 17, 2025) (Dkt. 10); *Zamora v. Noem*, 25-12750-NMG, 2025 WL 2958879 (D. Mass. Oct. 17, 2025); *Contreras-Cervantes v. Raycrafi*, No. 2:25-CV-13073, 2025 WL 2952796 (E.D. Mich. Oct. 17, 2025); *Diaz Sandoval v. Raycrafi*, No. 2:25-CV-12987, 2025 WL 2977517 (E.D. Mich. Oct. 17, 2025); *Pacheco Mayen v. Raycraft*, No. 2:25-CV-13056, 2025 WL 2978529 (E.D. Mich. Oct. 17, 2025); *Sanchez Alvarez v. Noem*, No. 1:25-CV-1090, 2025 WL 2942648 (W.D. Mich. Oct. 17, 2025); *H.G.V.U. v. Smith*, No. 25 CV 10931, 2025 WL 2962610 (N.D. Ill. Oct. 20, 2025); *De La Cruz v.*

Noem, No. 25-cv-150-LTS (N.D. Iowa Oct. 20, 2025) (Dkt. 24); Da Silva v. Moniz, No. 25-12563-LTS (D. Mass. Oct. 20, 2025) (Dkt. 15); *Hercules Acosta v. Hyde*, No. 25-13011-AK (D. Mass. Oct. 20, 2025) (Dkt. 10); *Monzon v. Hyde*, No. 25-12594-RGS (D. Mass. Oct. 20, 2025) (Dkt. 15); *Ruiz Barahona v. Hyde*, No. 25-12551-IT (D. Mass. Oct. 20, 2025) (Dkt. 13); *Miguel v. Noem*, No. 25 C 11137, 2025 WL 2976480 (N.D. Ill. Oct. 21, 2025); *Maldonado de Leon v. Baker*, No. CV 25-3084-TDC, 2025 WL 2968042 (D. Md. Oct. 21, 2025); *Araujo Da Silva v. Bondi*, No. 25-12672-DJC (D. Mass. Oct. 21, 2025) (Dkt. 16); *Casio-Mejia v. Raycraft*, No. 2:25-CV-13032, 2025 WL 2976737 (E.D. Mich. Oct. 21, 2025); *Contreras-Lomeli v. Raycraft*, No. 2:25-CV-12826, 2025 WL 2976739 (E.D. Mich. Oct. 21, 2025); *Jimenez Garcia v. Raybon*, No. 2:25-CV-13086, 2025 WL 2976950 (E.D. Mich. Oct. 21, 2025); *Santos Franco v. Raycraft*, No. 2:25-CV-13188, 2025 WL 2977118 (E.D. Mich. Oct. 21, 2025); *Herrera Avila v. Bondi*, No. CV 25-3741 (JRT/SGE), 2025 WL 2976539, at (D. Minn. Oct. 21, 2025); *Buestan v. Chu*, No. CV 25-16034 (MEF), 2025 WL 2972252 (D.N.J. Oct. 21, 2025); *Flores Pineda v. Simon*, No. 1:25-CV-01616-AJT-WEF, 2025 WL 2980729 (E.D. Va. Oct. 21, 2025); *Padilla v. Noem*, No. 25 CV 12462, 2025 WL 2977742 (N.D. Ill. Oct. 22, 2025); *Coelho Gomes v. Moniz*, No. 25-13021-MJJ (D. Mass. Oct. 22, 2025) (Dkt. 8); *Cortez Rivera v. Hyde*, No. 25-12390-IT, 2025 WL 2977900 (D. Mass. Oct. 22, 2025); *Moreira Aguiar v. Moniz*, No. 25-12706-IT, 2025 WL 2987656 (D. Mass. Oct. 22, 2025); *Soto v. Soto*, --- F. Supp. 3d ----, 2025 WL 2976572 (D.N.J. Oct. 22, 2025); *Hernandez Vazquez v. Baltasar*, No. 25-cv-03049-GPG (D. Colo. Oct. 23, 2025) (Dkt. 22); *Da Cruz v. Moniz*, No. 25-13067-MJJ (D. Mass. Oct. 23, 2025) (Dkt. 8); *Contreras Maldonado v. Cabezas*, No. CV 25-13004, 2025 WL 2985256 (D.N.J. Oct. 23, 2025); *Lomeu v. Soto*, No. 25CV16589 (EP), 2025 WL 2981296 (D.N.J. Oct. 23, 2025); *Del Cid v. Bondi*, No. 3:25-CV-00304, 2025 WL 2985150 (W.D. Pa. Oct. 23, 2025); *Nava Hernandez v. Baltazar*, No. 1:25-cv-03094-CNS, 2025 WL 2996643 (D. Colo. Oct. 24, 2025); *Patel v. Crowley*, No. 25 C 11180, 2025 WL 2996787 (N.D. Ill. Oct. 24, 2025); *Ajtzac Osorio v. Hyde*, No. 25-12678-DJC (D. Mass. Oct. 24, 2025) (Dkt. 17); *Arias Lopez v. Hyde*, No. 25-12680-NMG (D. Mass. Oct. 24, 2025) (Dkt. 21); *Mezdaoui v. Moniz*, No. 25-12999-JEK (D. Mass. Oct. 24, 2025) (Dkt. 9); *Aguilar Guerra v. Joyce*, No. 2:25-cv-00534-SDN (D. Me. Oct. 24, 2025) (Dkt. 18); *Rodriguez Carmona, v. Noem*, No. 1:25-CV-1131, 2025 WL 2992222 (W.D. Mich. Oct. 24, 2025); *Yobani v. Noem*, No. 1:25-CV-01666-AJT-LRV, 2025 WL 2997507 (E.D. Va. Oct. 24, 2025); *Martinez-Elvir v. Olson*, No. 3:25-CV-589-CHB, 2025 WL 3006772 (W.D. Ky. Oct. 27, 2025); *Orellana v. Noem*, No. 4:25-CV-112-RGJ, 2025 WL 3006763 (W.D. Ky. Oct. 27, 2025); *Pineda Velasquez v. Noem*, No. CV GLR-25-3215, 2025 WL 3003684 (D. Md. Oct. 27, 2025); *Chavez Castillo v. Moniz*, No. 25-13091-MJJ (D. Mass. Oct. 27, 2025) (Dkt. 8); *De Moura v. Moniz*, No. 25-13058-IT (D. Mass. Oct. 27, 2025) (Dkt. 10); *Lopez-Monteros v. Hyde*, No. 25-12629-NMG (D. Mass. Oct. 27, 2025) (Dkt. 21); *Mejia Arias v. Moniz*, No. 25-13019-IT (D. Mass. Oct. 27, 2025) (Dkt. 8); *Palencia Morales v. Hyde*, No. 25-13031-DJC (D. Mass. Oct. 27, 2025) (Dkt. 8); *Gimenez Gonzalez v. Raycraft*, No. 25-CV-13094, 2025 WL 3006185 (E.D. Mich. Oct. 27, 2025); *Tomas Elias v. Hyde*, No. 25-CV-540-JJM-AEM, 2025 WL 3004437 (D.R.I. Oct. 27, 2025); *Duarte Escobar v. Perry*, No. 3:25CV758, 2025 WL 3006742 (E.D. Va. Oct. 27, 2025); *Puerto-Hernandez v. Lynch*, No. 1:25-CV-1097, 2025 WL 3012033 (W.D. Mich. Oct. 28, 2025); *J.G.O. v. Francis*, No. 25-CV-7233 (AS), 2025 WL 3040142 (S.D.N.Y. Oct. 28, 2025); *Zolakio v. Hyde*, No. 25-13040-RGS (D. Mass. Oct. 28, 2025) (Dkt. 8); *Patel v. Almodovar*, No. CV 25-

15345 (SDW), 2025 WL 3012323 (D.N.J. Oct. 28, 2025); *Corona Diaz v. Olson*, No. 25 CV 12141, 2025 WL 3022170 (N.D. Ill. Oct. 29, 2025); *Marin Garcia v. Noem*, No. 1:25-CV-1271, 2025 WL 3017200 (W.D. Mich. Oct. 29, 2025); *Rodriguez v. Noem*, No. 1:25-CV-1196, 2025 WL 3022212 (W.D. Mich. Oct. 29, 2025); *Ramirez Valverde v. Olson*, No. 25-CV-1502, 2025 WL 3022700 (E.D. Wis. Oct. 29, 2025); *Singh v. Bondi*, No. 1:25-CV-02101-SEB-TAB, 2025 WL 3029524 (S.D. Ind. Oct. 30, 2025); *Ayala Amaya v. Bondi*, No. 25-CV-16428-ESK, 2025 WL 3033880 (D.N.J. Oct. 30, 2025); *Astudillo v. Hyde*, No. CV 25-551-JJM-AEM, 2025 WL 3035083 (D.R.I. Oct. 30, 2025); *Tejada Polanco v. Hyde*, No. 25-CV-552-JJM-AEM, 2025 WL 3033926 (D.R.I. Oct. 30, 2025); *Lopez Lopez v. Sheehan*, No. 25-CV-4052-CJW-KEM, 2025 WL 3046183 (N.D. Iowa Oct. 30, 2025); *Artola Arauz v. Baltazar*, No. 1:25-cv-03260-CNS (D. Colo. Oct. 31, 2025) (Dkt. 16); *Cervantes Arredondo v. Baltazar*, No. 1:25-cv-03040-RBJ (D. Colo. Oct. 31, 2025) (Dkt. 21); *Garcia v. Noem*, No. 2:25-CV-00879-SPC-NPM, 2025 WL 3041895 (M.D. Fla. Oct. 31, 2025); *Rosales Ponce v. Olson*, No. 25-CV-13037, 2025 WL 3049785 (N.D. Ill. Oct. 31, 2025); *Valencia v. Noem*, No. 25-CV-12829, 2025 WL 3042520 (N.D. Ill. Oct. 31, 2025); *Escobar-Ruiz v. Raycraft*, No. 1:25-CV-1232, 2025 WL 3039255 (W.D. Mich. Oct. 31, 2025); *Ruiz Mejia v. Noem*, No. 1:25-CV-1227, 2025 WL 3041827 (W.D. Mich. Oct. 31, 2025); *De Jesus Ramirez v. Noem*, No. 1:25-CV-1261, 2025 WL 3039266 (W.D. Mich. Oct. 31, 2025); *Godinez-Lopez v. Ladwig*, No. 2:25-CV-02962-SHL-ATC, 2025 WL 3047889 (W.D. Tenn. Oct. 31, 2025); *J.A.M. v. Streeval*, No. 4:25-CV-342 (CDL), 2025 WL 3050094 (M.D. Ga. Nov. 1, 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); *Mboup v. Field Off. Dir. of New Jersey Immigr. & Customs Enf't*, No. 2:25-CV-16882 (MEF), 2025 WL 3062791 (D.N.J. Nov. 3, 2025); *Vargas Ramos v. Rokosky*, No. 25CV15892 (EP), 2025 WL 3063588 (D.N.J. Nov. 3, 2025); *Aguirre Villa v. Normand*, No. 5:25-CV-89, 2025 WL 3095969 (S.D. Ga. Nov. 4, 2025) (R&R); *Alonso v. Tindall*, No. 3:25-CV-652-DJH, 2025 WL 3083920 (W.D. Ky. Nov. 4, 2025); *Salgado Mendoza v. Noem*, No. 1:25-CV-1252, 2025 WL 3077589 (W.D. Mich. Nov. 4, 2025); *Ortiz v. Freden*, No. 25-CV-960-LJV, 2025 WL 3085032 (W.D.N.Y. Nov. 4, 2025); *Reyes Arizmendi v. Noem*, No. 25 C 13041, 2025 WL 3089107 (N.D. Ill. Nov. 5, 2025); *Hernandez Capote v. Sec'y of U.S. Dep't of Homeland Security*, No. 25-13128, 2025 WL 3089756 (E.D. Mich. Nov. 5, 2025); *Lopez Sarmiento v. Perry*, 1:25-cv-01644-AJT-WBP, 2025 WL 3091140 (E.D. Va. Nov. 5, 2025); *Mirzoev v. Olson*, No. 25-CV-12969, 2025 WL 3101969 (N.D. Ill. Nov. 6, 2025); *Vicens-Marquez v. Soto*, No. CV 25-16906 (KSH), 2025 WL 3097496 (D.N.J. Nov. 6, 2025); *Romero Perez v. Francis*, No. 25-CV-8112 (JGK), 2025 WL 3110459 (S.D.N.Y. Nov. 6, 2025); *Vasquez Carmaco v. Noem*, 2025 WL 3119263 (M.D. Fla. Nov. 7, 2025); *Garcia Rios v. Noem*, 2025 WL 3124173 (N.D. Ill. Nov. 7, 2025); *Morales-Martinez v. Raycraft*, No. 25-CV-13303, 2025 WL 3124695 (E.D. Mich. Nov. 7, 2025); *Molina Ochoa v. Noem*, 2025 WL 3125846 (D.N.M. Nov. 7, 2025) (R&R); *Guartazaca Sumba v. Crowley*, No. 1:25-CV-13034, 2025 WL 3126512 (N.D. Ill. Nov. 9, 2025); *Perez-Gomez v. Warden, Camp East Montana Detention Facility*, No. CV 3:25CV773, 2025 WL 3141103 (E.D. Va. Nov. 10, 2025); *Lira Perez v. Noem*, No. 25 C 13442, 2025 WL 3140692 (N.D. Ill. Nov. 10, 2025); *Ramirez Martinez v. Noem*, No. 25-CV-12029, 2025 WL 3145103 (N.D. Ill. Nov. 11, 2025); *Lopez Briseno v. Noem*, No. 25 C 12092, 2025 WL 3145985 (N.D. Ill. Nov. 11, 2025); *Garcia Guevara v. Swearingen*, No. 25 C 12549, 2025 WL 3158151 (N.D. Ill. Nov. 12, 2025);

On September 5, 2025, the District Court for the District of Nevada granted a petition for habeas corpus on a closely related issue concerning immigration bonds. This Court noted in passing that "the decisions of federal district courts within the Ninth Circuit and across the country that have thus far considered and rejected DHS's novel interpretation of sections § 1225 and § 1226." *See Torralba v. Knight*, No. 2:25-v-01366-RFB-DJA, 2025 LX 396583, ECF 32 at 12 (D. Nev. Sept.5, 2025). For instance, in a September 17, 2025 order, this Court found that the phrases "applicants for admission" and "seeking admission" in § 1225(b)(2)(A) cannot be read to

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Adonay E.M. v. Noem, No. 25-CV-3975 (SRN/DTS), 2025 WL 3157839 (D. Minn. Nov. 12, 2025); *Chilel Chilel v. Sheehan*, No. C25-4053-LTS-KEM, 2025 WL 3158617 (N.D. Iowa Nov. 12, 2025); *Mauricio Diego v. Raycrafi*, No. 25-13288, 2025 WL 3159106 (E.D. Mich. Nov. 12, 2025); *Contreras Alvarez v. Noem*, No. 1:25-CV-1313, 2025 WL 3151948 (W.D. Mich. Nov. 12, 2025); *Lucero Lucero v. Noem*, No. 1:25-CV-1295, 2025 WL 3165235 (W.D. Mich. Nov. 12, 2025); *Guaman Naula v. Noem*, No. CV 25-16792 (SDW), 2025 WL 3158490 (D.N.J. Nov. 12, 2025); *Guaita Quinapanta v. Bondi*, No. 25-CV-795-WMC, 2025 WL 3157867 (W.D. Wis. Nov. 12, 2025); *Portillo Martinez v. Hyde*, No. CV 25-11909-BEM, 2025 WL 3152847 (D. Mass. Nov. 12, 2025); *Hernandez Silva v. Bondi*, No. 9:25-cv-251-MJT (E.D. Tex. Nov. 12, 2025) (Dkt. 10) (R&R); *Mariscal Serrano v. Salazar*, No. 25 C 13170, 2025 WL 3171354 (N.D. Ill. Nov. 13, 2025); *Delgado Avila v. Crowley*, No. 2:25-CV-00533-MPB-MJD, --- F. Supp. 3d ----, 2025 WL 3171175 (S.D. Ind. Nov. 13, 2025); *Singh v. Noem*, No. 1:25-CV-1251, 2025 WL 3170855 (W.D. Mich. Nov. 13, 2025); *Cabrera v. Noem*, No. 25 C 12160, 2025 WL 3171288 (N.D. Ill. Nov. 13, 2025); *Caguana-Caguana v. Moniz*, No. 1:25-CV-13142-IT, 2025 WL 3171043 (D. Mass. Nov. 13, 2025); *Anselmo v. Moniz*, No. 1:25-CV-13309-IT, 2025 WL 3171137 (D. Mass. Nov. 13, 2025); *Ginez Hernandez v. Noem*, No. 1:25-CV-1307, 2025 WL 3170872 (W.D. Mich. Nov. 13, 2025); *Mora 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); *Moreira Da Silva v. LaForge*, No. 25CV17095 (EP), 2025 WL 3173859 (D.N.J. Nov. 13, 2025); *Castanon Nava v. DHS*, No. 18-cv-3757 (N.D. Ill. Nov. 13, 2025) (Dkt. 247); *Rodriguez Loredo v. Forestal*, No. 25 C 12758, 2025 WL 3187319 (N.D. Ill. Nov. 14, 2025); *Dionisa Quinonez v. Olson*, No. 25 CV 13524, 2025 WL 3190598 (N.D. Ill. Nov. 14, 2025); *Pu Sacvin v. De Anda-Ybarra*, No. 2:25-CV-01031-KG-JFR, 2025 WL 3187432 (D.N.M. Nov. 14, 2025); *Kashranov v. Jamison*, No. 2:25-CV-05555-JDW, 2025 WL 3188399 (E.D. Pa. Nov. 14, 2025); *Cruz Gutierrez v. Thompson*, No. 4:25-4695, 2025 WL 3187521 (S.D. Tex. Nov. 14, 2025); and, *Morales Chavez v. Dir. Of Detroit Field Office*, No. 4:25-CV-2061, 2025 WL 3187080 (N.D. Ohio Nov. 14, 2025).

apply indefinitely to all noncitizens residing in the U.S. for years or decades. *Vazquez v. Feeley*, No. 2:25-CV-01542-RFB-EJY, 2025 WL 2676082 (D. Nev. Sept. 17, 2025). Rather, § 1225 is limited in temporal scope, and applies only to "noncitizens entering, attempting to enter, or who have recently entered the U.S." *Id.*

Here, Petitioners' detention is governed by § 1226, not § 1225. In Petitioners' NTA, DHS already designated them as "[aliens] ***present in the United States*** who [have] not been admitted or paroled." *See* **Exhs. C, I, & K**. This language is consistent with § 1226 detainees and EWIs detained before July 2025. The NTA does not designate them as "an arriving alien," further suggesting that they are entitled to be released under the bond orders already issued by an Immigration Judge in their particular cases. Indeed, under the DHS and DOJ's current policies, EWIs are subject to § 1225. *Id.* But decades of agency practice, the aforementioned case law interpreting these statutes, and principles of statutory interpretation demonstrate otherwise.

b. The rules of statutory interpretation demonstrate that § 1226, not § 1225 applies.

Section 1226(a) states: "[a]n alien may be arrested and detained pending a decision on whether the alien is to be removed from the United States." It goes on to state that bond is available when a noncitizen is arrested under § 1226(a), ***except*** as provided in subsection (c). As the *Rodriguez Vazquez* court concluded, a plain reading of this exception implies that the default bond procedures in § 1226(a)—which allows discretionary release—apply to a noncitizen who is present without being admitted or paroled but has not been implicated in any of the crimes enumerated in subsection (c). 779 F. Supp. 3d at 1256.

While § 1226 governs immigration arrests inside the country, § 1225 addresses "[i]nspection of aliens ***arriving in the United States*** and certain other aliens who have not been

admitted or paroled." 8 U.S.C. § 1225(b)(1). Thus, it is clear that § 1225 "applies primarily to aliens seeking entry into the United States," not those already here. *Rodriguez Diaz v. Garland*, 53 F.4th 1189, 11978 (9th Cir. 2022).

The dispute in this case is the text of § 1225(a)(1), which states that "an alien present in the United States who has not been admitted . . . shall be deemed for purposes of this chapter an applicant for admission." 8 U.S.C. § 1225(a)(1). It goes on to state that "if the examining immigration officer determines that" an applicant for admission who is "not clearly and beyond a doubt entitled to be admitted, the alien shall be detained" without bond. 8 U.S.C. § 1225(b)(2)(A). However, this position depends on reading these statutory provisions entirely in isolation. The Supreme Court requires statutes to be read to give meaning to ***all*** of its provisions. *See Corley v. United States*, 556 U.S. 303, 314 (2009).

The appropriate interpretation of these provisions is that § 1226 is the default rule for noncitizens apprehended while present in the United States, including EWIs, unless the noncitizen is specifically excluded under § 1226(c) due to a criminal conviction. Thus, § 1226 detainees are generally eligible for release on bond. By contrast, § 1225 generally applies to applicants seeking admission into the United States from the border.

c. <u>If statutory ambiguity exists, interpretation must be construed in favor of Petitioners and judicial review.</u>

To the extent that statutory ambiguity exists, the rule of lenity requires this Court to construe the statute in favor of Petitioners' liberty as a matter of constitutional due process. This rule states: "any reasonable doubt about the application of a penal law must be resolved in the favor of liberty," *Wooden v. United States*, 595 U.S. 360, 388 (2022) (Kavanaugh, J., concurring). This rule extends to the immigration context, as the Supreme Court has recognized

that the rule of lenity applies when physical liberty is at stake. *See Clark v. Martinez*, 543 U.S. 371, 380 (2005) (quoting *Leocal v. Ashcroft*, 543 U.S. 1, 11-12 n. 8 (2004)). Further, in evaluating the jurisdiction provisions of the INA, this Court is guided "by the general rule to resolve any ambiguities in a jurisdiction stripping statute in favor of the narrower interpretation and by the strong presumption in favor of judicial review." *Arce v. United States*, 899 F. 3d 796, 801 (9th Cir. 2018) (*per curiam*) (internal quotations and citations omitted).

Accordingly, between providing Petitioners with a bond hearing under § 1226 to advocating for their release on bond and eliminating this opportunity altogether, the former is clearly the resolution that most favors Petitioners' liberty, as well as judicial review. By contrast, a decision adopting § 1225 would strip Petitioners of their liberty when the statute does not obviously require that outcome. It would also strip this Court of jurisdiction to adjudicate matter, which would contradict the strong presumption in favor of judicial review in interpreting INA provisions.

d. Petitioners' *fundamental liberty interests* in being free from detention are at stake.

An individual's private interest in being free from physical restraint is "the most elemental of liberty interests." *Hamdi v.* Rumsfeld, 542 U.S. 507, 529 (2004); *see also Zadvydas v. Davis*, 533 U.S. 678, 690 (2001) (stating that freedom from imprisonment lies at the heart of the liberty that the Clause protects). In this country, liberty is the norm and detention "is the carefully limited exception." *United States v. Salerno*, 481 U.S. 739, 755 (1987).

Here, Petitioners have a substantial interest in being free from continuous, unlawful detention. They all been stripped away from their family. They have also been unable to work and earn income which their family largely depends on. Petitioners have suffered mental,

emotional, and financial distress as a result of their detention. The first *Mathews* factor weighs strongly in Petitioners' favor.

e. Mandatory detention poses a *substantial risk* of erroneous deprivation.

Given that individuals have a fundamental interest in freedom from detention, any deprivation of liberty requires substantial justification. *Jones v. United States*, 463 U.S. 354, 361 (1983). The Supreme Court has recognized that detention of noncitizens pending removal proceedings is permissible only for the limited purposes of preventing flight and protecting the community. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001). Where detention does not serve these purposes, it is unjustified.

Here, Petitioners' detention under § 1226(c) poses a substantial risk of erroneous deprivation, because two (2) petitioners have no convictions whatsoever and one (1) petitioner does not have a conviction that subjects him to mandatory detention. Further, the factual record contains no evidence suggesting that Petitioners are either a flight risk or a danger to the community. Immigration judges in all three (3) of Petitioners' cases have already ruled that Petitioners would be entitled to bond but for *Matter of Yajure Hurtado*, and have determined they pose no danger to the community and are not a flight risk. *See* **Exh. E** (Declaration of Chantell Abou-Hamdan, Esq.); *see also* **Exh. J** (Alfonso Mario Rios Rios, Order of the IJ, dated December 12, 2025); *see also* **Exh. O** (Lidio Lopez Lopez, Order of the IJ, dated December 12, 2025). As such, Petitioners are being deprived of their liberty and release, when release would allow them to reunite with their community, work to financially provide for their family, and access resources to assist with their pending removal proceedings cases. As a result, Petitioners face a substantial risk of erroneous deprivation.

f. Respondents do not suffer any *undue burden* by Petitioners release on bond.

Respondents would not suffer any undue burden by releasing Petitioners on the bond they are entitled. On the contrary, requiring their release ensures that Respondents fulfill legitimate governmental interests. Courts have recognized that the public has no interest in the detention without bond of an individual who faces no criminal charges and who is an active, contributing member of his community. *Doe*, 2025 WL 2576819, at *11. By affording Petitioners the ability to post their bonds, Respondents conserve resources over the long term. *See Hernandez*, 872 F.3d at 996 (noting in 2017 that "the costs to the public of immigration detention are staggering: $158 each day per detainee, amounting to a total daily cost of $6.5 million. Supervised release programs cost much less by comparison: between 17 cents and 17 dollars each day per person). And importantly, Respondents appeared to acknowledge this—DHS counsel did not reserve appeal or otherwise oppose Petitioners' release on the alternative bond the IJs entered or stated it would enter if not for *Matter of Yajure Hurtado*. *See* **Exh. E** (Declaration of Chantell Abou-Hamdan, Esq.); *see also* **Exh. J** (Alfonso Mario Rios Rios, Order of the IJ, dated December 12, 2025); *see also* **Exh. O** (Lidio Lopez Lopez, Order of the IJ, dated December 12, 2025).

While release on bond for Petitioners whom the Immigration Court has already determined are fit for release poses no burden to Respondent, the denial of release on bond imposes a substantial burden on Petitioners. They have already endured months of separation from their families, causing not only financial harm to their individual households but also significant emotional harm for Petitioners and their families. **Exh. A** (Declaration of Jose Alberto Gonzalez Hernandez); **Exh. G** (Declaration of Alfonso Mario Rios Rios); **Exh. L** (Declaration of Lidio Lopez Lopez).

To conclude, because § 1225 is inapplicable to Petitioners' circumstances, Petitioners are not subject to mandatory detention. Consistent with the requirements of due process, they are entitled to be released on bond to which the IJs in their particular cases have determined are entitled.

C. Petitioners Will Suffer Irreparable Harm Without a TRO.

The Ninth Circuit has held that a petitioner at risk of continuing immigration detention has demonstrated irreparable harm. *See Rodriguez v. Robbins*, 715 F.3d 1127, 1145 (9th Cir. 2013). Here, Petitioners and their family will suffer irreparable harm if this Court does not intervene. Most importantly, without a TRO or preliminary injunction to pause their immigration proceedings, with the Immigration Court's expedited detained dockets, there is a strong possibility that Respondents will deport Petitioners before they have the chance to challenge their detention. Petitioners' removal to Mexico would undoubtedly cause lasting harm to them and their families. **Exh. A** (Declaration of Jose Alberto Gonzalez Hernandez); **Exh. G** (Declaration of Alfonso Mario Rios Rios); **Exh. L** (Declaration of Lidio Lopez Lopez).

D. The Balance of Equities and the Public Interest Favors a TRO.

The balance of equities weighs heavily in favor of granting Petitioners' request for a TRO. Petitioners face significant disadvantages, including their lengthy detention, lack of access to resources, and undocumented status. By contrast, Respondents possess substantial institutional resources. Granting a TRO to pause Petitioners' immigration proceedings—and thereby preventing their potential deportation before this Court can consider their petition—is necessary to level the playing field and ensure that Petitioners have a meaningful opportunity to challenge their detention.

Further, the public interest will not be harmed by ordering the government to follow the same policies it has been complying with since 1997. To the contrary, granting Petitioners relief would ensure that the weighty legal issues in Petitioners' cases are not at risk of being rendered moot. If Petitioners remain detained, the Immigration Court will move forward on an expedited docket that may adjudicate their removal case before the BIA rules on the bond appeal, or before this Petition reaches a final conclusion. Thus, an illegal detention would be allowed to persist without a judicial remedy. This is not in the public interest.

E. This Court Should Not Require Petitioners to Provide Security Before the TRO.

Federal Rule of Civil Procedure 65(c) provides that "[t]he court may issue a preliminary injunction or a temporary restraining order only if the movant gives security in an amount that the court considers proper to pay the costs and damage sustained by any party found to have been wrongfully enjoined or restrained." However, district courts exercise discretion in cases brought by indigent and/or incarcerated people, and in the vindication of immigrants' rights. *See e.g., Ashland v. Cooper*, 863 F.2d 691, 693 (9th Cir. 1988); *P.J.E.S. by & through Escobar Francisco v. Wolf*, 502 F. Supp. 3d 492, 520 (D.D.C. 2020). Additionally, courts "may dispense with the filing of a bond when," as here, "there is no realistic likelihood of harm to the defendant from enjoining his or her conduct," *Jorgensen v. Cassiday*, 320 F.3d 906, 919 (9th Cir. 2003), or a plaintiff shows a high likelihood of success on the merits. *See, e.g., People of State of Cal. ex rel. Van De Kamp v. Tahoe Reg'l Plan. Agency*, 766 F.2d 1319, 1325 (9th Cir. 1985), *amended*, 775 F.2d 998 (9th Cir. 1985).

Here, this Court should exercise its discretion to waive the security requirement because Petitioners are financially burdened due to their inability to work for months as a result of their

detention and its effects on their respective households. Given Petitioners' circumstances, this Court should waive the security requirement.

CONCLUSION

The Court should grant Petitioners' motion for a temporary restraining order, or alternatively, a preliminary injunction, which orders the immediate release of Petitioners from ICE detention under the conditions imposed by the IJs in their alternative orders, or in the alternative, orders the Immigration Court to hold bond hearings in which it finds it has jurisdiction under § 1226(a).

DATED this 13th day of December 2025.

Respectfully Submitted,

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EXHIBIT LIST

A	Declaration of Jose Alberto Gonzalez Hernandez	MOT001-004
B	Article from Boise State Public Radio, dated October 20, 2025	MOT005-009
C	Jose Alberto Gonzalez Hernandez, Notice to Appear	MOT010-014
D	Jose Alberto Gonzalez Hernandez, Order of the IJ, dated November 3, 2025	MOT015-017
E	Declaration of Chantell Abou-Hamdan, Esq.	MOT018-020
F	Jose Alberto Gonzalez Hernandez, Order of the IJ, dated December 1, 2025	MOT021-023
G	Declaration of Alfonso Mario Rios Rios	MOT024-027
H	Alfonso Mario Rios Rios, I-213	MOT028-031
I	Alfonso Mario Rios Rios, NTA	MOT032-036
J	Alfonso Mario Rios Rios, Order of the IJ, dated December 12, 2025	MOT037-039
K	Lidio Lopez Lopez, Partial NTA, pages 1 and 4 of 4	MOT040-042
L	Declaration of Lidio Lopez Lopez	MOT043-047
M	Lidio Lopez Lopez, Judgment of Conviction	MOT048-050
N	Lidio Lopez Lopez, Guilty Plea Agreement and Second Amended Indictment	MOT050-060
O	Lidio Lopez Lopez, Order of the IJ, dated December 12, 2025	MOT061-063