

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OKLAHOMA

3 1. GARCIA GONZALEZ, EUSTOLIO,
4
5 Petitioner,

Case No.

6 v.

7 2. KRISTI NOEM, Secretary, U.S.
8 Department of Homeland Security
9 3. U.S. DEPARTMENT OF HOMELAND
10 SECURITY;
11 4. PAMELA BONDI, U.S. Attorney
12 General;
13 5. JOSHUA JOHNSON, Enforcement and
14 Removal Operations, Immigration and
15 Customs Enforcement, Dallas Field
16 Office Director;
17 6. EXECUTIVE OFFICE FOR
18 IMMIGRATION REVIEW;
19 7. DON JONES, Director of the Kay
20 County Detention Center;
21 8. KAY COUNTY JUSTICE FACILITIES
22 AUTHORITY, a public trust DBA Kay
23 County Detention Center;
24 Respondents.

**PETITION FOR WRIT OF
HABEAS CORPUS**

EMERGENCY PETITION OF WRIT OF HABEAS CORPUS
PURSUANT TO 28 U.S.C. 2241 AND INJUNCTIVE RELIEF

1 INTRODUCTION

- 2 1. Petitioner Eustolio Garcia Gonzalez brings this petition for a writ of habeas corpus to seek
3 enforcement of his rights as a member of the Bond Denial Class certified in *Maldonado*
4 *Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM (C.D. Cal.) Petitioner is in the
5 physical custody of Respondents at the Kay County Justice Facility at 1101 W Dry Road
6 Newkirk, OK 74647. He now faces unlawful detention because the Department of
7 Homeland Security (DHS) and the Executive Office for Immigration Review (EOIR) have
8 refused to abide by the declaratory judgment issued on behalf of the certified class in
9 *Maldonado Bautista v. Santacruz*.
- 10 2. On November 20, 2025, the district court granted partial summary judgment on behalf of
11 individual plaintiffs and on November 25, 2025, certified a nationwide class and extended
12 declaratory judgment to the certified class. *Maldonado Bautista v. Santacruz*, No. 5:25-
13 CV-01873-SSS-BFM, --- F. Supp. 3d ----, 2025 WL 3289861, at *11 (C.D. Cal. Nov. 20,
14 2025) (order granting partial summary judgment to named Plaintiffs-Petitioners);
15 *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, --- F. Supp. 3d ----,
16 2025 WL 3288403, at *9 (C.D. Cal. Nov. 25, 2025) (order certifying Plaintiffs-
17 Petitioners' proposed nationwide Bond Eligible Class, incorporating and extending
18 declaratory judgment from Order Granting Petitioners' Motion for Partial Summary
19 Judgment).
- 20 3. The declaratory judgment held that the Bond Denial Class members are detained under 8
21 U.S.C. § 1226(a) and thus may not be denied consideration for release on bond under §
22 1225(b)(2)(A). *Maldonado Bautista*, 2025 WL 3289861, at *11.
- 23
24

1 4. Nonetheless, the Executive Office for Immigration Review and its subagency, the
2 Immigration Court and the Department of Homeland Security (DHS) have blatantly
3 refused to abide by the declaratory relief and have unlawfully ordered that Petitioner be
4 denied the opportunity to be released on bond.

5 5. Petitioner Eustolio Garcia Gonzalez is a member of the Bond Eligible Class, as he:

6 a. does not have lawful status in the United States and is currently detained at the
7 Kay Co Justice Facility. He was apprehended by immigration authorities on
8 11/08/2025.

8 b. entered the United States without inspection over 15 years ago and was not
9 apprehended upon arrival, *cf. id.*; and

9 c. is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

10 6. After apprehending Petitioner on 11/08/2025, the DHS placed him in removal proceedings
11 pursuant to 8 U.S.C. § 1229a. DHS has charged Petitioner as being inadmissible under 8
12 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection.

13 7. The Court should expeditiously grant this petition.

14 8. Respondents are bound by the judgment in *Maldonado Bautista*, as it has the full “force
15 and effect of a final judgment.” 28 U.S.C. § 2201(a). Nevertheless, Respondents continue
16 to flagrantly defy the judgment in that case and continue to subject Petitioner to unlawful
17 detention despite his clear entitlement to consideration for release on bond as a Bond
18 Eligible Class member.

19 9. Immigration judges have informed class members in bond hearings that they have been
20 instructed by “leadership” that the declaratory judgment in *Maldonado Bautista* is not
21 controlling, even with respect to class members, and that instead IJs remain bound to
22 follow the agency’s prior decision in *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA
23 2025).

1 10. Even before the ruling in *Maldonado Bautista*, DHS had denied Petitioner release from
2 immigration custody, consistent with a new DHS policy issued on July 8, 2025,
3 instructing all Immigration and Customs Enforcement (ICE) employees to consider
4 anyone inadmissible under § 1182(a)(6)(A)(i)—i.e., those who entered the United States
5 without admission or inspection—to be subject to detention under 8 U.S.C. §
6 1225(b)(2)(A) and therefore ineligible to be released on bond.

7 11. Similarly, on September 5, 2025, the Board of Immigration Appeals (BIA or Board)
8 issued a precedent decision, binding on all immigration judges, holding that an
9 immigration judge has no authority to consider bond requests for any person who entered
10 the United States without admission. *See Matter of Yajure Hurtado*, 29 I. & N. Dec. 216
11 (BIA 2025). The Board determined that such individuals are subject to detention under 8
12 U.S.C. § 1225(b)(2)(A) and therefore ineligible to be released on bond.

13 12. Petitioner’s detention on this basis violates the plain language of the Immigration and
14 Nationality Act. Section 1225(b)(2)(A) does not apply to individuals like Petitioner who
15 previously entered and are now residing in the United States. Respondents erroneously
16 seek to classify Petitioner, and similarly situated noncitizens, as an “applicant for
17 admission” under §1225(b) who is “seeking admission.” Instead, such individuals are
18 subject to a different statute, § 1226(a), that allows for release on conditional parole or
19 bond. That statute expressly applies to people who, like Petitioner, are charged as
20 inadmissible for having entered the United States without inspection.

21 13. Because Respondents are detaining Petitioner in violation of the declaratory judgment
22 issued in *Maldonado Bautista* and because Respondents’ new legal interpretation is
23 plainly contrary to the statutory framework and contrary to decades of agency practice
24

1 applying § 1226(a) to people like Petitioner, the Court should accordingly order that
2 within one day, Respondent DHS must release Petitioner.

3 14. Alternatively, the Court should order Petitioner's release unless Respondents provide a
4 bond hearing under 8 U.S.C. § 1226(a) within seven days.

5 JURISDICTION

6 15. Petitioner is in the physical custody of Respondents. Petitioner is detained at the Kay Co
7 Justice Facility.

8 16. This Court has jurisdiction under 28 U.S.C. § 2241(c)(5) (habeas corpus), 28 U.S.C. §
9 1331 (federal question), and Article I, section 9, clause 2 of the United States Constitution
10 (the Suspension Clause).

11 17. This Court may grant relief pursuant to 28 U.S.C. § 2241, the Declaratory Judgment Act,
12 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.

13 VENUE

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

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

21 REQUIREMENTS OF 28 U.S.C. § 2243

22 20. The Court should grant the petition for writ of habeas corpus "forthwith," as the legal
23 issues have already been resolved for class members in *Maldonado Bautista*.

1 21. Habeas corpus is “perhaps the most important writ known to the constitutional law . . .
2 affording as it does a *swift* and imperative remedy in all cases of illegal restraint or
3 confinement.” *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added). “The application
4 for the writ usurps the attention and displaces the calendar of the judge or justice who
5 entertains it and receives prompt action from him within the four corners of the
6 application.” *Yong v. I.N.S.*, 208 F.3d 1116, 1120 (9th Cir. 2000) (citation omitted).

7 **PARTIES**

8 22. Petitioner Eustolio Garcia Gonzalez is a citizen of Mexico who has been in immigration
9 detention since 11/08/2025. After Petitioner was arrested in Atwood, Oklahoma.

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

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

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

21 26. Respondent JOSHUA JOHNSON is the Director of the DALLAS Field Office of ICE’s
22 Enforcement and Removal Operations division. As such, JOSHUA JOHNSON is
23
24

1 Petitioner's immediate custodian and is responsible for Petitioner's detention and
2 removal. He is named in his official capacity.

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

6 28. Respondent Executive Office for Immigration Review (EOIR) is the federal agency
7 responsible for implementing and enforcing the INA in removal proceedings, including
8 for custody redeterminations in bond hearings.

9 29. Respondent DON JONES as Director of the Kay County Detention Center, where
10 Petitioner is detained. He has immediate physical custody of Petitioner. He is sued in his
11 official capacity.

12 30. Respondent KAY COUNTY JUSTICE FACILITIES AUTHORITY is responsible for
13 funding the daily operations of the Kay County Detention Center, where Petitioner is
14 detained.

15 **LEGAL FRAMEWORK**

16 31. The INA prescribes three basic forms of detention for the vast majority of noncitizens in
17 removal proceedings.

18 32. First, 8 U.S.C. § 1226 authorizes the detention of noncitizens in standard removal
19 proceedings before an IJ. *See* 8 U.S.C. § 1229a. Individuals in § 1226(a) detention are
20 generally entitled to a bond hearing at the outset of their detention, *see* 8 C.F.R. §§
21 1003.19(a), 1236.1(d), while noncitizens who have been arrested, charged with, or
22 convicted of certain crimes are subject to mandatory detention, *see* 8 U.S.C. § 1226(c).

1 33. Second, the INA provides for mandatory detention of noncitizens subject to expedited
2 removal under 8 U.S.C. § 1225(b)(1) and for other recent arrivals seeking admission
3 referred to under § 1225(b)(2).

4 34. Last, the INA also provides for detention of noncitizens who have been ordered removed,
5 including individuals in withholding-only proceedings, *see* 8 U.S.C. § 1231(a)–(b).

6 35. This case concerns the detention provisions at §§ 1226(a) and 1225(b)(2).

7 36. The detention provisions at § 1226(a) and § 1225(b)(2) were enacted as part of the Illegal
8 Immigration Reform and Immigrant Responsibility Act (IIRIRA) of 1996, Pub. L. No.
9 104–208, Div. C, §§ 302–03, 110 Stat. 3009–546, 3009–582 to 3009–583, 3009–585.

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

12 37. Following the enactment of the IIRIRA, EOIR drafted new regulations explaining that, in
13 general, people who entered the country without inspection were not considered detained
14 under § 1225 and that they were instead detained under § 1226(a). *See* Inspection and
15 Expedited Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal
16 Proceedings; Asylum Procedures, 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997).

17 38. Thus, in the decades that followed, most people who entered without inspection and were
18 placed in standard removal proceedings received bond hearings, unless their criminal
19 history rendered them ineligible pursuant to 8 U.S.C. § 1226(c). That practice was
20 consistent with many more decades of prior practice, in which noncitizens who were not
21 deemed “arriving” were entitled to a custody hearing before an IJ or other hearing officer.
22 *See* 8 U.S.C. § 1252(a) (1994); *see also* H.R. Rep. No. 104-469, pt. 1, at 229 (1996)

1 (noting that § 1226(a) simply “restates” the detention authority previously found at §
2 1252(a)).

3 39. On July 8, 2025, ICE, “in coordination with” DOJ, announced a new policy that rejected
4 well-established understanding of the statutory framework and reversed decades of
5 practice.

6 40. The new policy, entitled “Interim Guidance Regarding Detention Authority for Applicants
7 for Admission,”¹ claims that all persons who entered the United States without inspection
8 shall now be subject to mandatory detention provision under § 1225(b)(2)(A). The policy
9 applies regardless of when a person is apprehended, and affects those who have resided in
10 the United States for months, years, and even decades.

11 41. On September 5, 2025, the BIA adopted this same position in a published decision, *Matter*
12 *of Yajure Hurtado*. There, the Board held that all noncitizens who entered the United
13 States without admission or parole are subject to detention under § 1225(b)(2)(A) and are
14 ineligible for IJ bond hearings.

15 42. Since Respondents adopted their new policies, dozens of federal courts have rejected their
16 new interpretation of the INA’s detention authorities. Courts have likewise rejected *Matter*
17 *of Yajure Hurtado*, which adopts the same reading of the statute as ICE.

18 43. Even before ICE or the BIA introduced these nationwide policies, IJs in the Tacoma,
19 Washington, immigration court stopped providing bond hearings for persons who entered
20 the United States without inspection and who have since resided here. There, the U.S.
21 District Court in the Western District of Washington found that such a reading of the INA
22 is likely unlawful and that § 1226(a), not § 1225(b), applies to noncitizens who are not

23 _____
24 ¹ Available at <https://www.aila.org/library/ice-memo-interim-guidance-regarding-detention-authority-for-applications-for-admission>.

1 apprehended upon arrival to the United States. *Rodriguez Vazquez v. Bostock*, 779 F.
2 Supp. 3d 1239 (W.D. Wash. 2025).

3 44. Subsequently, court after court has adopted the same reading of the INA's detention
4 authorities and rejected ICE and EOIR's new interpretation. *See, e.g., Gomes v. Hyde*, No.
5 1:25-CV-11571-JEK, 2025 WL 1869299 (D. Mass. July 7, 2025); *Diaz Martinez v. Hyde*,
6 No. CV 25-11613-BEM, --- F. Supp. 3d ---, 2025 WL 2084238 (D. Mass. July 24, 2025);
7 *Rosado v. Figueroa*, No. CV 25-02157 PHX DLR (CDB), 2025 WL 2337099 (D. Ariz.
8 Aug. 11, 2025), *report and recommendation adopted*, No. CV-25-02157-PHX-DLR
9 (CDB), 2025 WL 2349133 (D. Ariz. Aug. 13, 2025); *Lopez Benitez v. Francis*, No. 25
10 CIV. 5937 (DEH), 2025 WL 2371588 (S.D.N.Y. Aug. 13, 2025); *Maldonado v. Olson*,
11 No. 0:25-cv-03142-SRN-SGE, 2025 WL 2374411 (D. Minn. Aug. 15, 2025); *Arrazola-*
12 *Gonzalez v. Noem*, No. 5:25-cv-01789-ODW (DFMx), 2025 WL 2379285 (C.D. Cal. Aug.
13 15, 2025); *Romero v. Hyde*, No. 25-11631-BEM, 2025 WL 2403827 (D. Mass. Aug. 19,
14 2025); *Samb v. Joyce*, No. 25 CIV. 6373 (DEH), 2025 WL 2398831 (S.D.N.Y. Aug. 19,
15 2025); *Ramirez Clavijo v. Kaiser*, No. 25-CV-06248-BLF, 2025 WL 2419263 (N.D. Cal.
16 Aug. 21, 2025); *Leal-Hernandez v. Noem*, No. 1:25-cv-02428-JRR, 2025 WL 2430025
17 (D. Md. Aug. 24, 2025); *Kostak v. Trump*, No. 3:25-cv-01093-JE-KDM, 2025 WL
18 2472136 (W.D. La. Aug. 27, 2025); *Jose J.O.E. v. Bondi*, No. 25-CV-3051 (ECT/DJF), ---
19 F. Supp. 3d ---, 2025 WL 2466670 (D. Minn. Aug. 27, 2025) *Lopez-Campos v. Raycraft*,
20 No. 2:25-cv-12486-BRM-EAS, 2025 WL 2496379 (E.D. Mich. Aug. 29, 2025); *Vasquez*
21 *Garcia v. Noem*, No. 25-cv-02180-DMS-MM, 2025 WL 2549431 (S.D. Cal. Sept. 3,
22 2025); *Zaragoza Mosqueda v. Noem*, No. 5:25-CV-02304 CAS (BFM), 2025 WL
23 2591530 (C.D. Cal. Sept. 8, 2025); *Pizarro Reyes v. Raycraft*, No. 25-CV-12546, 2025
24

1 WL 2609425 (E.D. Mich. Sept. 9, 2025); *Sampiao v. Hyde*, No. 1:25-CV-11981-JEK,
2 2025 WL 2607924 (D. Mass. Sept. 9, 2025); *see also, e.g., Palma Perez v. Berg*, No.
3 8:25CV494, 2025 WL 2531566, at *2 (D. Neb. Sept. 3, 2025) (noting that “[t]he Court
4 tends to agree” that § 1226(a) and not § 1225(b)(2) authorizes detention); *Jacinto v.*
5 *Trump*, No. 4:25-cv-03161-JFB-RCC, 2025 WL 2402271 at *3 (D. Neb. Aug. 19, 2025)
6 (same); *Anicasio v. Kramer*, No. 4:25-cv-03158-JFB-RCC, 2025 WL 2374224 at *2 (D.
7 Neb. Aug. 14, 2025) (same).

8 45. Courts have uniformly rejected DHS’s and EOIR’s new interpretation because it defies the
9 INA. As the *Rodriguez Vazquez* court and others have explained, the plain text of the
10 statutory provisions demonstrates that § 1226(a), not § 1225(b), applies to people like
11 Petitioner.

12 46. Section 1226(a) applies by default to all persons “pending a decision on whether the
13 [noncitizen] is to be removed from the United States.” These removal hearings are held
14 under § 1229a, to “decid[e] the inadmissibility or deportability of a[] [noncitizen].”

15 47. The text of § 1226 also explicitly applies to people charged as being inadmissible,
16 including those who entered without inspection. *See* 8 U.S.C. § 1226(c)(1)(E).

17 Subparagraph (E)’s reference to such people makes clear that, by default, such people are
18 afforded a bond hearing under subsection (a). As the *Rodriguez Vazquez* court explained,
19 “[w]hen Congress creates ‘specific exceptions’ to a statute’s applicability, it ‘proves’ that
20 absent those exceptions, the statute generally applies.” *Rodriguez Vazquez*, 779 F. Supp.
21 3d at 1257 (citing *Shady Grove Orthopedic Assocs., P.A. v. Allstate Ins. Co.*, 559 U.S.
22 393, 400 (2010)); *see also Gomes*, 2025 WL 1869299, at *7.

1 48. Section 1226 therefore leaves no doubt that it applies to people who face charges of being
2 inadmissible to the United States, including those who are present without admission or
3 parole.

4 49. By contrast, § 1225(b) applies to people arriving at U.S. ports of entry or who recently
5 entered the United States. The statute's entire framework is premised on inspections at the
6 border of people who are "seeking admission" to the United States. 8 U.S.C.
7 § 1225(b)(2)(A). Indeed, the Supreme Court has explained that this mandatory detention
8 scheme applies "at the Nation's borders and ports of entry, where the Government must
9 determine whether a[] [noncitizen] seeking to enter the country is admissible." *Jennings v.*
10 *Rodriguez*, 583 U.S. 281, 287 (2018).

11 50. Accordingly, the mandatory detention provision of § 1225(b)(2)(A) does not apply to
12 people like Petitioner, who have already entered and were residing in the United States at
13 the time they were apprehended.

14 **CLAIMS FOR RELIEF**

15 **COUNT 1**

16 **Violation of the INA:**
17 **Request for Relief Pursuant to *Maldonado Bautista***

18 51. Petitioner repeats, re-alleges, and incorporates by reference each and every allegation in
19 the preceding paragraphs as if fully set forth herein.

20 52. As a member of the Bond Eligible Class, Petitioner is entitled to consideration for release
21 on bond under 8 U.S.C. § 1226(a).

22 53. The order granting partial summary judgment in *Maldonado Bautista* holds that
23 Respondents violate the INA in applying the mandatory detention statute at § 1225(b)(2)
24 to class members.

1 54. The order granting class certification in *Maldonado Bautista* further orders that “[w]hen
2 considering this determination with the MSJ Order, the Court extends the same
3 declaratory relief granted to Petitioners to the Bond Eligible Class as a whole.”

4 55. Respondents are parties to *Maldonado Bautista* and bound by the Court’s declaratory
5 judgment, which has the full “force and effect of a final judgment.” 28 U.S.C. § 2201(a).

6 56. By denying Petitioner a bond hearing under § 1226(a) and asserting that he is subject to
7 mandatory detention under § 1225(b)(2), Respondents violate Petitioner’s statutory rights
8 under the INA and the Court’s judgment in *Maldonado Bautista*.

9 **COUNT II**

10 **Violation of the INA**

11 57. Petitioner incorporates by reference the allegations of fact set forth in the preceding
12 paragraphs.

13 58. The mandatory detention provision at 8 U.S.C. § 1225(b)(2) does not apply to all noncitizens
14 residing in the United States who are subject to the grounds of inadmissibility. As relevant
15 here, it does not apply to those who previously entered the country and have been residing in
16 the United States prior to being apprehended and placed in removal proceedings by
17 Respondents. Such noncitizens are detained under § 1226(a), unless they are subject to
18 § 1225(b)(1), § 1226(c), or § 1231.

19 59. The application of § 1225(b)(2) to Petitioner unlawfully mandates his continued detention
20 and violates the INA.

21 **COUNT III**

22 **Violation of Due Process**

23 60. Petitioner repeats, re-alleges, and incorporates by reference each and every allegation in the
24 preceding paragraphs as if fully set forth herein.

1 61. The government may not deprive a person of life, liberty, or property without due process of
2 law. U.S. Const. amend. V. “Freedom from imprisonment—from government custody,
3 detention, or other forms of physical restraint—lies at the heart of the liberty that the Clause
4 protects.” *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

5 62. Petitioner has a fundamental interest in liberty and being free from official restraint.

6 63. The government’s detention of Petitioner without a bond redetermination hearing to
7 determine whether he is a flight risk or danger to others violates his right to due process.

8
9 **PRAYER FOR RELIEF**

10 WHEREFORE, Petitioner prays that this Court grant the following relief:

- 11 a. Assume jurisdiction over this matter;
- 12 b. Order that Petitioner shall not be transferred outside the Western District while
13 this habeas petition is pending;
- 14 c. Declare Petitioner’s detention is unlawful;
- 15 d. Issue a writ of habeas corpus requiring that within one day, Respondents release
16 Petitioner;
- 17 e. Alternatively, issue a writ of habeas corpus requiring Respondents to release
18 Petitioner unless they provide a bond hearing under 8 U.S.C. § 1226(a) within
19 seven days;
- 20 f. Award Petitioner attorney’s fees and costs under the Equal Access to Justice Act
21 (EAJA), as amended, 28 U.S.C. § 2412, and on any other basis justified under
22 law; and
- 23 g. Grant any other and further relief that this Court deems just and proper.

24 DATED this 12th day of December, 2025.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

s/ Sam Wargin
Sam Wargin
Michael Brooks-Jiménez, P.C.
5708 S. Western Ave.
Oklahoma City, OK 73109
Tel: (405) 272-9393
Fax: (405) 272-9398
Email: sam.w@brooksjimenez.com

Michael Brooks
Michael Brooks-Jiménez, P.C.
5708 S. Western Ave.
Oklahoma City, OK 73109
Tel: (405) 272-9393
Fax: (405) 272-9398
Email: michael.b@brooksjimenez.com

Attorneys for Petitioner