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9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF ARIZONA**

12 **Gustavo Sandoval Cirne,**
13 **Petitioner,**

14 v.

15 **Kristi Noem**, Secretary of the United States
16 Department of Homeland Security, in her official
17 capacity; **Todd Lyons**, Acting Director U.S.
18 Immigration and Customs Enforcement, in his official
19 capacity; **John Cantu**, Field Office Director for ICE’s
20 Enforcement and Removal Operation’s (“ERO”) Field
21 Office, in his official capacity; **Sirce Owen**, Acting
22 Director of Executive Office for Immigration Review,
23 in her official capacity; **Luis Rosa, Jr.**, Warden of the
24 Florence Correctional Center, in his official capacity,
25 **Respondents.**

Case No.

Agency No. 

**PETITION FOR WRIT
OF HABEAS CORPUS
PURSUANT TO 28 U.S.C.
§2241**

26 **INTRODUCTION**

27 The Respondents are unlawfully detaining Petitioner Gustavo Sandoval Cirne, at
28 the Florence Correctional Center, due to the Department of Homeland Security (DHS)
recently changed its long-standing position with regard to the status of mandatory
detention. See, ICE Memo: Interim Guidance Regarding Detention Authority for
Applications for Admission filed herewith as Exhibit 1. The Bureau of Immigration

1 Appeals (BIA) issued a precedential decision on September 5, 2025, holding that all
2 noncitizens present in the United States without admission – no matter how long they
3 have resided here – are still “applicants for admission” under 8 U.S.C. § 1225(a) and
4 not entitled to bond hearings because they are subject to mandatory detention under §
5 1225(b)(2)(A). *See, Matter of Yajure Hurtado*, 29 I&N Dec. 216 (B.I.A. 2025) filed
6 herewith as Exhibit 2.
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9 But this interpretation of the Immigration and Naturalization Act (INA) violates
10 both procedural and substantive Fifth Amendment protections, ignores the plain
11 statutory language of both § 1225 and § 1226, and is contrary to numerous recent Federal
12 Court decisions in this District that have rejected these exact arguments. *See e.g.*
13 10/3/2025 Order entered in *Francisco Echevarria v. Pam Bondi, et al.*, CV-25-03252-
14 PHX-DWL (ESW), (D. Ariz. 10/3/2025), filed herewith as Exhibit 16.
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16
17 Petitioner has resided in the United States continuously since 2002. *See,*
18 Petitioner’s Affidavit. He is the father of five children, four of whom are United States
19 citizens, and one who is not a citizen. His children are 8, 10, 13, and 16 years old, all of
20 whom depend on him for emotional and financial support. Petitioner has no criminal
21 history and is currently statutorily eligible for cancellation of removal under INA §
22 240A(b). *Id.* He poses no danger to the community and no risk of flight, and his
23 prolonged detention without an opportunity for a bond hearing serves no legitimate
24 governmental purpose. Further, when Respondents issued a Notice to Appear, it
25 identified Petitioner as an “alien present in the United States” despite “arriving alien”
26 being an option. *See,* Petitioner’s Notice to Appear, filed herewith as Exhibit 5.
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1 In addition to BIA decisions not being binding precedent upon this Court, the
2 Supreme Court decision last year in *Loper Bright Enterprises v. Raimondo*, 603 U.S.
3 369, 400 (2024), made clear that federal courts must independently interpret statutes and
4 no longer defer under so-called “Chevron deference.” This Court is therefore in the best
5 position to determine whether the Respondents are misinterpreting the relevant federal
6 statutes and improperly denying alien detainees bond hearings on the grounds that they
7 are all subject to mandatory detention under § 1225(b)(2)(A). The petition for writ of
8 habeas corpus should be granted.
9
10

11 JURISDICTION & CUSTODY

12
13 1. Petitioner Gustavo Sandoval Cirne, is in the physical custody of
14 Respondents and Immigration and Customs Enforcement (ICE), an agency within the
15 Department of Homeland Security.
16

17 2. Petitioner is currently detained at Florence Correctional Center and is
18 under the direct control of Respondents and their agents.
19

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

22 4. This Court has jurisdiction under 28 U.S.C. § 2241, Art. I § 9, cl. 2 of
23 the United States Constitution, 28 U.S.C. § 1331, and the common law. This Court may
24 grant relief pursuant to 28 U.S.C. § 2241, the Declaratory Judgment Act, 28 U.S.C. §
25 2201 et seq., and the All Writs Act, 28 U.S.C. § 1651.
26

27 5. Congress has preserved judicial review of challenges to immigration
28 detention. See *Jennings v. Rodriguez*, 583 U.S. 122, 130-131 (2018) (holding that 8

1 U.S.C. §§ 1226(e) and 1252(b)(9) do not bar review of challenges to prolonged
2 immigration detention).

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4 6. The Court must grant the petition for writ of habeas corpus or order
5 Respondents to show cause “forthwith,” unless the petitioner is not entitled to relief. 28
6 U.S.C. § 2243. If an order to show cause is issued, Respondents must file a return
7 “within three days unless for good cause additional time, not exceeding twenty days, is
8 allowed.” *Id.*


9
10 7. The Court has inherent power to release the petitioner pending review
11 of his petition. *See Martin v. Solem*, 801 F.2d 324, 329 (8th Cir. 1986).

12
13 **VENUE**

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

17
18 9. Venue is also properly in this Court pursuant to 18 U.S.C. § 1391(e)
19 because Respondents are employees, officers, and agencies of the United States.

20
21 **PARTIES**

22 10. Petitioner Gustavo Sandoval Cirne was born on  in
23 Puebla, Mexico. Petitioner is currently detained by ICE at Florence Correctional Center.
24 *See*, ICE Online Detainee Locator, filed herewith as Exhibit 3.

25
26 11. Respondent Kristi Noem is the Secretary of the U.S. Department of
27 Homeland Security (“DHS”). In this capacity, Respondent Noem is a legal custodian of
28 Petitioner. Respondent Noem is sued in her official capacity.

1 12. Respondent DHS is a federal executive agency responsible for, among
2 other things, enforcing federal immigration laws and overseeing lawful immigration to
3 the United States. Respondent DHS is a legal custodian of Petitioner.
4

5 13. Respondent Todd M. Lyons is Acting Director and Senior Official
6 Performing the Duties of the Director of U.S. Immigration and Customs Enforcement
7 (“ICE”). Respondent Lyons is responsible for ICE’s policies, practices, and procedures,
8 including those relating to the detention of immigrants during their removal procedures.
9 Respondent Lyons is a legal custodian of Petitioner. Respondent Lyons is sued in his
10 official capacity.
11

12 14. Respondent ICE is a federal law enforcement agency within DHS.
13 Respondent ICE is responsible for the enforcement of immigration laws, including the
14 detention and removal of immigrants. Respondent ICE is a legal custodian of Petitioner.
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16 15. Respondent John Cantu is Field Office Director for ICE’s Enforcement
17 and Removal Operation’s (“ERO”) Field Office. Respondent Cantu is a legal custodian
18 of Petitioner and is sued in his official capacity.
19

20 16. Respondent Luis Rosa, Jr. is the Warden of the Florence Correctional
21 Center. Respondent Rosa, Jr. is a legal custodian of Petitioner. Respondent Rosa, Jr. is
22 sued in his official capacity.
23

24 17. Respondent Sirce Owen is the Acting Director of the Executive Office
25 for Immigration Review (EOIR), a federal agency within the U.S. Department of Justice.
26 Respondent EOIR is responsible for the administration of immigration courts, and
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28

1 acceptance of forms and petitions related to adjudication of immigration claims, as well
2 as motions for bond. Respondent Sirce Owen is sued in her official capacity.

3
4 **STATEMENT OF FACTS**

5 18. Petitioner Gustavo Sandoval Cirne was born on  in
6 Puebla, Mexico.

7 19. Petitioner Gustavo Sandoval Cirne last entered the United States on
8 February 22, 2002. *See*, Petitioner's Affidavit, filed herewith as Exhibit 4.

9 20. Respondents arrested Petitioner on November 3, 2002. *Id.*

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

13 22. Petitioner is detained at the Florence Correctional Center where he
14 remains in custody. *See* ICE Online Detainee Locator Printout, filed herewith as Exhibit
15 3.

16 23. Petitioner is the father of five children, four of whom are United States
17 citizens, and one who is not a citizen. His children are 8, 10, 13, and 16 years old. *See*,
18 Petitioner's Affidavit, filed herewith as Exhibit 4.

19 24. Petitioner has no criminal history. He is currently eligible for
20 cancellation of removal under INA § 240A(b).

21 25. Petitioner filed an Application for Cancellation of Removal for Certain
22 Nonpermanent Residents on December 8, 2025. *See*, Petitioner's Application for
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1 Cancellation of Removal for Certain Nonpermanent Residents, filed herewith as Exhibit
2 6.

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4 26. Petitioner has no criminal history. *See* Petitioner’s Affidavit, filed
5 herewith as Exhibit 4.

6 **LEGAL FRAMEWORK**

7
8 27. The length of time that a petitioner has been living in the United States
9 is a constitutionally relevant consideration, because “once an alien enters the country,
10 the legal circumstance changes, for the Due Process Clause applies to all ‘persons’
11 within the United States, including aliens, whether their presence here is lawful,
12 unlawful, temporary, or permanent.” *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001). It
13 is therefore reasonable to read these statutes “against [that] backdrop.” *See Hewitt v.*
14 *United States*, 605 U.S. —, 145 S. Ct. 2165, 2173 (2025).
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16
17 28. Due process thus requires “adequate procedural protections” to ensure
18 that the government’s asserted justification for a noncitizen’s physical confinement
19 “outweighs the individual’s constitutionally protected interest in avoiding physical
20 restraint.” *Zadvydas*, 533 U.S. at 690 (internal quotation marks omitted).
21

22 29. In the immigration context, the Supreme Court has recognized only
23 two valid purposes for civil detention: to mitigate the risks of danger to the community
24 and to prevent flight. *Id.*; *Demore*, 538 U.S. at 528. The government may not detain a
25 noncitizen based on any other justification.
26

27 30. Congress has granted the Attorney General discretion to decide
28 whether to detain or release certain noncitizens pending a removal decision. *See* 8 U.S.C.

1 § 1226(a). The Attorney General has delegated that authority to IJs. 8 C.F.R. §§ 1003.19,
2 1236.1.

3
4 31. On July 8, 2025, DHS adopted a new policy on mandatory detention
5 for noncitizens who have been residing in the United States. *See*, ICE Memo: Interim
6 Guidance Regarding Detention Authority for Applications for Admission filed herewith
7 as Exhibit 1.

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

14
15 33. The Ninth Circuit has held that § 1226(a) is the “default” detention
16 statute for aliens in removal proceedings “[8 U.S.C. §1226(a) (“Subsection A”)] is the
17 default detention statute for noncitizens in removal proceedings and applies to
18 noncitizens “[e]xcept as provided in [Subsection C].” 8 U.S.C. § 1226(a).” *Avilez v.*
19 *Garland*, 69 F. 4th 525, 529-530 (9th Cir. 2022). *Accord*, *Rodriguez Diaz v. Garland*,
20 83 F. 4th 1177, 1179 (9th Cir. 2023); *Sarr v. Scott*, 765 F. Supp. 3d 1091, 1095 (WD
21 Wash. 2025); *Prieto-Romero v. Clark*, 534 F.3d 1053, 1057 (9th Cir. 2008). *Casas-*
22 *Castrillon v. DHS*, 535 F.3d 942 (9th Cir. 2008).

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26 34. Almost every Federal District Court that has considered the issue has
27 found that DHS’s interpretation defies the INA. In Arizona, the following decisions so
28 find and collect the cases from other district courts around the country:

- 1 a. 11/26/2025 Order granting habeas in *Luna-Gonzalez v. Noem*, et al., Case
2 No. 25-cv-03794-PHX (D. Ariz. 11-26-25)(The court rejected the
3 government’s argument that the petitioner is an “arriving alien” subject to
4 mandatory detention under § 1225 and agrees instead with the growing
5 majority of courts that people like the petitioner—who were arrested
6 inside the United States long after entering—are detained under § 1226(a),
7 not § 1225.), gathering cases, filed with the Habeas Petition as Exhibit 7;
- 8 b. 11/24/25 Order granting habeas in *Padron-Carreron v. Noem*, et al., Case
9 No. 25-cv-04204-PHX (D. Ariz. 11-25-25)(“Respondents correctly
10 acknowledge that their view still represents the minority position—in the
11 weeks since the Court considered the issue in *Echevarria*, dozens of other
12 courts have reached the same conclusion... [that] § 1226(a)’s application
13 for the past three decades supports its application to noncitizens in
14 petitioner’s position”), gathering cases, filed with the Habeas Petition as
15 Exhibit 8;
- 16 c. 11/18/2025 Order granting habeas in *Rodrigues da Silva v. Figueroa*, et
17 al., Case No. 25-cv-04015-PHX (D. Ariz. 11-18-25)(“dozens of other
18 district courts have concluded individuals like Petitioner are subject to §
19 1226 and not § 1225 and, therefore, are not subject to mandatory
20 detention”), gathering cases, filed with the Habeas Petition as Exhibit 9;
- 21 d. 11/13/2025 Order granting habeas in *Perez Rodriguez v. Noem*, et al., Case
22 No. 25-cv-03921-PHX (D. Ariz. 11/13/2025)(“the vast majority of courts
23 concluded individuals like Petitioner are subject to § 1226 and not § 1225
24 and, therefore, are not subject to mandatory detention”), gathering cases,
25 filed with the Habeas Petition as Exhibit 10
- 26 e. 11/6/25 Order granting habeas in *Gonzalez Rodriguez v. Bondi*, et al., Case
27 No. 25-cv-03917-PHX (D. Ariz. 11-6-25)(“dozens of other district courts
28 have concluded individuals like Petitioner are subject to § 1226 and not §
1225 and, therefore, are not subject to mandatory detention”), gathering
cases, filed with the Habeas Petition as Exhibit 11
- f. 11/6/2025 Order Granting Habeas in *Abrego-Zarate v. Noem*, et al., Case
No. 25-cv-03564-KML (D. Ariz. 11-6-25)(“the great weigh of authority

1 is that individuals like petitioner are not subject to mandatory detention.
2 This court agrees with the majority view. For these reasons, the petition is
3 granted, and petitioner must receive a bond hearing without application of
4 *Matter of Yajure Hurtado*, 29 I&N 216 (B.I.A. 2025.”), filed herewith as
5 Exhibit 12.

6 g. 11/03/25 Order granting habeas petition in *Lopez-Cruz v. Noem, et al*, No.
7 2:25-cv-03566-DJH--ASB (D. Ariz. 11/3/2025)(“dozens of other district
8 courts have concluded individuals like Petitioner are subject to § 1226 and
9 not § 1225 and, therefore, are not subject to mandatory detention. This
10 Court agrees with this conclusion.”), filed herewith as Exhibit 13.

11 h. 10/22/2025 Order granting habeas in *Garcia-Rosales v. Noem, et al.*, No.
12 2:25-cv-03391-SHD-DMF at page 2 (D. Ariz. Oct. 22, 2025)(“while
13 Respondents point to two district court opinions adopting their
14 interpretation of § 1225(b)(2)(A), myriad other district courts have
15 reached the same conclusion as *Echevarria* and held individuals like
16 Petitioner are not subject to mandatory detention under 1225(b)(2)(A)”),
17 filed herewith as Exhibit 14.

18 i. 10/17/2025 Order granting habeas corpus in *Benitez-Cornejo v. Cantu, et*
19 *al.*, No. 2:25-cv-03672 (D. Arizona Oct. 17, 2025)(“individuals like
20 Petitioner are not “arriving aliens” subject to mandatory detention but,
21 rather, are subject to the general removal statute, 8 U.S.C. § 1226(a)”),
22 filed herewith as Exhibit 15.

23 j. 10/09/2025 Order granting habeas entered in *Hector Lopez-Melo v. Bondi,*
24 *et. al.*, Case No. Case 2:25-cv-03394-DJH--JZB (D. Ariz.
25 10/9/2025)(“petitioner, who had been present in the United States for
26 years, was not an applicant for admission under 1225(b)(2)(A) or subject
27 to mandatory detention”), filed herewith as Exhibit 16.

28 k. 10/07/2025 Order granting habeas corpus in *Bo Li v. Cantu, et al.*, No.
CV-25-02989-PHX-SPL (D Arizona 10/07/2025)(“Respondents maintain
he is subject to mandatory detention under 1225(b)(2). Again,
Respondents are mistaken.”), filed herewith as Exhibit 17.

1 1. 10/3/2025 Order granting habeas corpus in *Echevarria v. Bondi, et al.*, No.
2 2:25-cv-03252-PHX-DWL, 2025 WL 2821282 (D. Ariz. Oct. 3,
3 2025)(“Court agrees with the majority of courts that have concluded that
4 § 1226(a), rather than § 1225(b)(2)(A), applies in this circumstance.”),
5 filed herewith as Exhibit 18.

6 m. 08/11/2025 Magistrate’s Report and Recommendation in *Rocha Rosado*
7 *v. Figueroa*, No. CV-25-02157-PHX-DLR 2025 WL 2349133 at *10 (D.
8 Ariz. Aug. 13, 2025)(Magistrate’s Report and Recommendation Adopted
9 at 2025 WL 2349133)([t]he text of § 1226, the canons of statutory
10 interpretation, this section's legislative history, and longstanding agency
11 practice indicate that Rosado is subject to § 1226(a)’s ‘default’ rule for
12 discretionary detention rather than § 1225’s mandatory detention
13 requirement, and that the IJ erred by finding they did not have jurisdiction
14 to consider Rosado's detention.”) *report and recommendation adopted sub*
15 *nom.* 2025 WL 2349133 (D. Ariz. Aug. 13, 2025), filed herewith as
16 Exhibit 19.

17 35. Petitioner has located only 5 cases holding to the contrary. In *Vargas*
18 *Lopez v. Trump*, --F. Supp. 3d--, 2025 WL 2780351 (D. Neb. Sept. 30, 2025), the court
19 held that Vargas Lopez failed to meet his burden to show that he falls under § 1226(a),
20 so “his Petition fails regardless of the parties’ arguments about the scope of § 1225(b)
21 and § 1226(a).” *Vargas Lopez v. Trump*, 2025 WL 2780351 at *7 (emphasis added). In
22 *Chavez v. Noem*, -- F. Supp. 3d --, 2025 WL 2730228 (S.D. Cal. Sept. 24, 2025), the
23 court denied a temporary restraining order on the grounds that the petitioners had “not
24 demonstrated serious questions about the application of Section 1225 to aliens present
25 in the United States.” *Chavez v. Noem*, 2025 WL 2730228 at *4. However, the court
26 spent less than 2 pages analyzing the statutory language and caselaw before concluding
27 that “Petitioners have not shown either a likelihood of success or serious questions going
28

1 to the merits [therefore] we do not address the remaining Winter factors.” *Chavez v.*
2 *Noem*, 2025 WL 2730228 at *5. *Mejia Olalde v. Noem*, 2025 U.S. Dist. LEXIS 221830
3 (E.D. Mo. Nov. 10, 2025) was concerned with whether the habeas petition had been
4 properly filed in that court’s jurisdiction and never reached the application of § 1225(b)
5 to the petitioner. *Pipa-Aquise v. Bondi*, No. 25-1094, 2025 WL 2490657 (E.D. Va. Aug.
6 5, 2025) and *Pena v. Hyde*, No. 25-11983, 2025 WL 2108913 (D. Mass. July 28, 2025)
7 were each shorter than two pages long and neither contained any significant analysis.
8 Thus, none of these cases are particularly instructive.
9

10
11 36. In 1997, after Congress amended the INA through the Illegal
12 Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA), EOIR and
13 the then-Immigration and Naturalization Service issued an interim rule to interpret and
14 apply IIRIRA. Specifically, under the heading of “Apprehension, Custody, and
15 Detention of Aliens,” the agencies explained that:
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17

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

21 62 Fed. Reg. at 10323 (emphasis added). The agencies thus made clear that
22 individuals who had entered without inspection ***were*** eligible for consideration for
23 bond and bond hearings before IJs under 8 U.S.C. § 1226 and its implementing
24 regulations.
25

26 37. Thus, for almost 30 years, all participants in the immigration system
27 have understood that people arrested inside the United States generally fall within §
28

1 1226 for detention purposes and are therefore required to receive a bond hearing upon
2 request—even if they initially entered the country without permission. *See Martinez v.*
3 *Hyde*, No. 25-11613, 2025 WL 2084238, at *4 n.9 (D. Mass. July 24, 2025) (citing the
4 United States Solicitor General’s representation to the Supreme Court at oral argument
5 that “DHS’s long-standing interpretation has been that 1226(a) applies to those who
6 have crossed the border between ports of entry and are shortly thereafter apprehended”).
7
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9 38. Despite the overwhelming number of federal cases that have ruled
10 against the government’s position, DHS and DOJ are continuing to systemically
11 misclassify people and unlawfully deny them access to bond hearings and release on
12 bond during the pendency of their immigration proceedings.
13

14 **CLAIMS FOR RELIEF**
15 **FIRST CLAIM FOR RELIEF**
16 **Violation of Fifth Amendment – Substantive Due Process**

17 39. Petitioner realleges and incorporates herein the allegations contained
18 in the preceding paragraphs of the petition as if fully set forth herein.
19

20 40. The Due Process Clause of the Fifth Amendment forbids the
21 government from depriving any “person” of liberty “without due process of law,”
22 including noncitizens. U.S. Const. amend. V.
23

24 41. Substantive due process asks whether a person’s life, liberty, or
25 property is deprived without sufficient purpose. There is no question that Petitioner has
26 been deprived of his liberty in this case.
27
28

1 42. The government's continued detention of Petitioner is not supported
2 by any special interest or compelling justification that outweighs his liberty interest.

3
4 43. Petitioner's ongoing detention when so many federal courts have held
5 that he is entitled to be considered for release upon posting an appropriate bond under §
6 1226 constitutes prolonged detention and violates his substantive due process rights.

7
8 **SECOND CLAIM FOR RELIEF**
9 **Violation of Fifth Amendment Right - Procedural Due Process**

10 44. Petitioner realleges and incorporates herein the allegations contained
11 in the preceding paragraphs of the petition as if fully set forth herein.

12 45. The Due Process Clause of the Fifth Amendment guarantees Petitioner
13 the right to procedural due process in seeking a bond redetermination and the
14 government may not unreasonably restrict this right.

15
16 46. The government's knowing misclassification of Petitioner as an
17 "applicant for admission" under § 1225 in order to justify its argument for mandatory
18 detention is not supported by any special interest or compelling justification that
19 outweighs Petitioner's liberty interest.

20
21 47. The continued detention of Petitioner is not supported by any special
22 interest or compelling justification that outweighs his liberty interest.

23
24 **PRAYER FOR RELIEF**

25 **WHEREFORE** Petitioner Gustavo Sandoval Cirne respectfully requests that
26 the Court grant the following relief:
27

- 28 1. Assume jurisdiction over this matter;

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

I represent Petitioner Gustavo Sandoval Cirne 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 this 12th day of December, 2025.

By: /s/ *Erica Sanchez*
Erica Sanchez, Esq.

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LIST OF EXHIBITS

Exhibit 1	<u>ICE Memo: Interim Guidance Regarding Detention Authority for Applications for Admission</u> (last visited September 8, 2025).
Exhibit 2	<i>Matter of Yajure Hurtado</i> , 29 I&N Dec. 216 (B.I.A. 2025).
Exhibit 3	ICE Online Detainee Locator Printout
Exhibit 4	Petitioner's Affidavit
Exhibit 5	Notice to Appear
Exhibit 6	Cover Page: Petitioner's Application for Cancellation of Removal for Certain Nonpermanent Residents
Exhibit 7	Order granting habeas in <i>Luna-Gonzalez v. Noem, et al.</i> , Case No. 25-cv-03794-PHX (D. Ariz. 11-26-25)
Exhibit 8	Order granting habeas in <i>Padron-Carreron v. Noem, et al.</i> , Case No. 25-cv-04204-PHX (D. Ariz. 11-24-25)
Exhibit 9	Order granting habeas in <i>Rodrigues da Silva v. Figueroa, et al.</i> , Case No. 25-cv-04015-PHX (D. Ariz. 11-18-25)
Exhibit 10	Order entered <i>Perez Rodriguez v. Noem, et al.</i> , Case No. 25-cv-03921-PHX (D. Ariz. 11/13/2025)
Exhibit 11	Order entered <i>Gonzalez Rodriguez v. Bondi, et al.</i> , Case No. 25-cv-03917-PHX (D. Ariz. 11-6-25)
Exhibit 12	Order entered in <i>Abrego-Zarate v. Noem, et al.</i> , Case No. 25-cv-03564-KML (D. Ariz. 11-6-25)
Exhibit 13	Order entered in <i>Lopez-Cruz v. Noem, et al.</i> , No. 2:25-cv-03566-DJH--ASB (D. Ariz. 11/3/2025)
Exhibit 14	Order entered in <i>Garcia-Rosales v. Noem, et al.</i> , No. 2:25-cv-03391-SHD—DMF (D. Ariz. Oct. 22, 2025)
Exhibit 15	Order granting habeas corpus in <i>Benitez-Cornejo v. Cantu, et al.</i> , No. 2:25-cv-03672 (D. Arizona Oct. 17, 2025)
Exhibit 16	Order entered in <i>Hector Lopez-Melo v. Bondi, et al.</i> , Case No. Case 2:25-cv-03394-DJH--JZB [docket no. 11] (D.C. Ariz. 10/9/2025)
Exhibit 17	Order granting habeas corpus in <i>Bo Li v. Cantu, et al.</i> , No. CV-25-02989-PHX-SPL (D. Arizona 10/07/2025)
Exhibit 18	Order entered in <i>Francisco Echevarria v. Pam Bondi, et al.</i> , CV-25-03252-PHX-DWL (ESW), (D. Ariz. 10/3/2025)

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Exhibit 19	Magistrate's Report and Recommendation in <i>Rocha Rosado v. Figueroa</i> , No. CV-25-02157-PHX-DLR (CDB), 2025 WL 2349133 (D. Ariz. Aug. 13, 2025)
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