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10 **UNITED STATES DISTRICT COURT**
11 **FOR THE DISTRICT OF ARIZONA**

12 Eduardo Cisneros Catana,)
13) No. 2:25-cv-04680-MTL-JFM
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1. Petitioner, by and through undersigned counsel, hereby replies to Respondents' Response to the Court's Order to Show Cause, and hence to the Petition for Writ of Habeas Corpus.

2. As Respondents concede, Petitioner is a member of the "Bond Eligible Class" in *Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, 2025 WL 3288403 ,at *1 (C.D. Cal. Nov. 25, 2025).

3. The *Bautista* Final Judgment dated December 18, 2025, (referenced by Respondents) declares that Bond Eligible Class members are entitled to consideration for release on bond by immigration officers. Therefore, Petitioner requests that the Court order DHS to have an immigration officer immediately consider Petitioner for release on bond, without regard to the DHS policy described in

1 the July 8, 2025, “Interim Guidance Regarding Detention Authority for Applicants for
2 Admission” which was vacated in the *Bautista* Final Judgment.

3 4. Petitioner also requests that the Court order a bond redetermination
4 hearing to be conducted by an immigration judge within 7 days or less. If the Court
5 enters this Order on December 22, the Immigration Court can conduct the hearing on
6 either December 23 or 29, dates which the Immigration Court will be open.
7 Immigration bond hearings typically take less than 15 minutes and do not typically
8 involve testimony. All of the bond documents have previously been submitted to the
9 immigration court, so the matter is ready to be heard by an immigration judge
10 regarding the question of whether Petitioner is a danger to the community or a flight
11 risk. Petitioner has never been convicted of any crime. He has applied for
12 Cancellation of Removal for Certain Non-permanent Residents (Form 42B) with the
13 immigration court and his individual merits hearing for that application is scheduled
14 for December 30. Therefore, the immigration court has all of the information and
15 documentation needed to conduct an individualized bond hearing on December 23 or
16 29. Respondents have not offered a reason why the immigration court would be
17 unable to conduct a bond hearing for Petitioner on either December 23 or 29.

18 DATED this 22nd day of December, 2025.

19 Respectfully submitted,

20 /s/ Robert E. Coughlon, Jr.

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