

1 Erica Sanchez, Of Counsel
2 Shefer Law Firm, P.A.
3 800 SE 4th. Ave #803
4 Hallandale Beach, Florida 33009
5 Telephone: (480) 866-1111
6 erica@shefer.legal
7 Arizona Bar #027107
8 Attorney for Petitioner

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

12 **Fidencio Cordero Ramos,**
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; **Fred Figueroa**, Warden of the
24 Eloy Detention 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 Fidencio Cordero Ramos, at
28 the Eloy Detention 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

1 Admission filed herewith as Exhibit 1. The Bureau of Immigration Appeals (BIA)
2 issued a precedential decision on September 5, 2025, holding that all noncitizens present
3 in the United States without admission – no matter how long they have resided here –
4 are still “applicants for admission” under 8 U.S.C. § 1225(a) and not entitled to bond
5 hearings because they are subject to mandatory detention under § 1225(b)(2)(A). *See,*
6 *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (B.I.A. 2025) filed herewith as Exhibit 2.
7
8

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.
15

16 Despite having filed his application for asylum and withholding of removal and
17 possessing no criminal history, Petitioner remains detained without any opportunity to
18 present evidence that he is not a flight risk or a danger to the community. *See,* Attorney’s
19 Affidavit, filed herewith as Exhibit 4. Further, when Respondents issued a Notice to
20 Appear, it identified Petitioner as an “alien present in the United States” despite
21 “arriving alien” being an option. *See,* Petitioner’s Notice to Appear, filed herewith as
22 Exhibit 5.
23
24
25

26 In addition to BIA decisions not being binding precedent upon this Court, the
27 Supreme Court decision last year in *Loper Bright Enterprises v. Raimondo*, 603 U.S.
28

1 369, 400 (2024), made clear that federal courts must independently interpret statutes and
2 no longer defer under so-called “Chevron deference.” This Court is therefore in the best
3 position to determine whether the Respondents are misinterpreting the relevant federal
4 statutes and improperly denying alien detainees bond hearings on the grounds that they
5 are all subject to mandatory detention under § 1225(b)(2)(A). The petition for writ of
6 habeas corpus should be granted.
7
8

9 **JURISDICTION & CUSTODY**

10 1. Petitioner Fidencio Cordero Ramos, is in the physical custody of
11 Respondents and Immigration and Customs Enforcement (ICE), an agency within the
12 Department of Homeland Security.
13

14 2. Petitioner is currently detained at Eloy Detention Center and is under
15 the direct control of Respondents and their agents.
16

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

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

24 5. Congress has preserved judicial review of challenges to immigration
25 detention. *See Jennings v. Rodriguez*, 583 U.S. 122, 130-131 (2018) (holding that 8
26
27
28

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

3
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 Fidencio Cordero Ramos was born on  in
23 Guatemala City, Guatemala. Petitioner is currently detained by ICE at Eloy Detention
24 Center. *See*, ICE Online Detainee Locator, filed herewith as Exhibit 3.

1
2 25. The length of time that a petitioner has been living in the United States
3 is a constitutionally relevant consideration, because “once an alien enters the country,
4 the legal circumstance changes, for the Due Process Clause applies to all ‘persons’
5 within the United States, including aliens, whether their presence here is lawful,
6 unlawful, temporary, or permanent.” *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001). It
7 is therefore reasonable to read these statutes “against [that] backdrop.” *See Hewitt v.*
8 *United States*, 605 U.S. —, 145 S. Ct. 2165, 2173 (2025).
9

10
11 26. Due process thus requires “adequate procedural protections” to ensure
12 that the government’s asserted justification for a noncitizen’s physical confinement
13 “outweighs the individual’s constitutionally protected interest in avoiding physical
14 restraint.” *Zadvydas*, 533 U.S. at 690 (internal quotation marks omitted).
15

16 27. In the immigration context, the Supreme Court has recognized only
17 two valid purposes for civil detention: to mitigate the risks of danger to the community
18 and to prevent flight. *Id.*; *Demore*, 538 U.S. at 528. The government may not detain a
19 noncitizen based on any other justification.
20

21 28. Congress has granted the Attorney General discretion to decide
22 whether to detain or release certain noncitizens pending a removal decision. *See* 8 U.S.C.
23 § 1226(a). The Attorney General has delegated that authority to IJs. 8 C.F.R. §§ 1003.19,
24 1236.1.
25
26
27
28

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

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

11
12 31. The Ninth Circuit has held that § 1226(a) is the “default” detention
13 statute for aliens in removal proceedings “[8 U.S.C. §1226(a) (“Subsection A”)] is the
14 default detention statute for noncitizens in removal proceedings and applies to
15 noncitizens “[e]xcept as provided in [Subsection C].” 8 U.S.C. § 1226(a).” *Avilez v.*
16 *Garland*, 69 F. 4th 525, 529-530 (9th Cir. 2022). *Accord, Rodriguez Diaz v. Garland*,
17 83 F. 4th 1177, 1179 (9th Cir. 2023); *Sarr v. Scott*, 765 F. Supp. 3d 1091, 1095 (WD
18 Wash. 2025); *Prieto-Romero v. Clark*, 534 F.3d 1053, 1057 (9th Cir. 2008). *Casas-*
19 *Castrillon v. DHS*, 535 F.3d 942 (9th Cir. 2008).

20
21
22 32. Almost every Federal District Court that has considered the issue has
23 found that DHS’s interpretation defies the INA. In Arizona, the following decisions so
24 find and collect the cases from other district courts around the country:
25
26
27
28

- 1 a. 12/12/2025 Order granting habeas in *Gonzalez-Gonzalez v. Noem*, et al.,
2 Case No. 25-cv-04478-DWL (D. Ariz 12-12-25)(The court declined to
3 revisit the conclusion it reached in *Echevarria*).
- 4 b. 11/26/2025 Order granting habeas in *Luna-Gonzalez v. Noem*, et al., Case
5 No. 25-cv-03794-PHX (D. Ariz 11-26-25)(The court rejected the
6 government’s argument that the petitioner is an “arriving alien” subject to
7 mandatory detention under § 1225 and agrees instead with the growing
8 majority of courts that people like the petitioner—who were arrested
9 inside the United States long after entering—are detained under § 1226(a),
10 not § 1225.), gathering cases, filed with the Habeas Petition as Exhibit 7;
- 11 c. 11/24/25 Order granting habeas in *Padron-Carreron v. Noem*, et al., Case
12 No. 25-cv-04204-PHX (D. Ariz. 11-25-25)(“Respondents correctly
13 acknowledge that their view still represents the minority position—in the
14 weeks since the Court considered the issue in *Echevarria*, dozens of other
15 courts have reached the same conclusion... [that] § 1226(a)’s application
16 for the past three decades supports its application to noncitizens in
17 petitioner’s position”), gathering cases, filed with the Habeas Petition as
18 Exhibit 8;
- 19 d. 11/18/2025 Order granting habeas in *Rodrigues da Silva v. Figueroa*, et
20 al., Case No. 25-cv-04015-PHX (D. Ariz. 11-18-25)(“dozens of other
21 district courts have concluded individuals like Petitioner are subject to §
22 1226 and not § 1225 and, therefore, are not subject to mandatory
23 detention”), gathering cases, filed with the Habeas Petition as Exhibit 9;
- 24 e. 11/13/2025 Order granting habeas in *Perez Rodriguez v. Noem*, et al., Case
25 No. 25-cv-03921-PHX (D. Ariz. 11/13/2025)(“the vast majority of courts
26 concluded individuals like Petitioner are subject to § 1226 and not § 1225
27 and, therefore, are not subject to mandatory detention”), gathering cases,
28 filed with the Habeas Petition as Exhibit 10
- f. 11/6/25 Order granting habeas in *Gonzalez Rodriguez v. Bondi*, et al., Case
No. 25-cv-03917-PHX (D. Ariz. 11-6-25)(“dozens of other district courts
have concluded individuals like Petitioner are subject to § 1226 and not §

1 1225 and, therefore, are not subject to mandatory detention”), gathering
2 cases, filed with the Habeas Petition as Exhibit 11

- 3
4 g. 11/6/2025 Order Granting Habeas in *Abrego-Zarate v. Noem, et al.*, Case
5 No. 25-cv-03564-KML (D. Ariz. 11-6-25)(“the great weigh of authority
6 is that individuals like petitioner are not subject to mandatory detention.
7 This court agrees with the majority view. For these reasons, the petition is
8 granted, and petitioner must receive a bond hearing without application of
9 *Matter of Yajure Hurtado*, 29 I&N 216 (B.I.A. 2025.”), filed herewith as
10 Exhibit 12.
- 11 h. 11/03/25 Order granting habeas petition in *Lopez-Cruz v. Noem, et al*, No.
12 2:25-cv-03566-DJH--ASB (D. Ariz. 11/3/2025)(“dozens of other district
13 courts have concluded individuals like Petitioner are subject to § 1226 and
14 not § 1225 and, therefore, are not subject to mandatory detention. This
15 Court agrees with this conclusion.”), filed herewith as Exhibit 13.
- 16 i. 10/22/2025 Order granting habeas in *Garcia-Rosales v. Noem, et al.*, No.
17 2:25-cv-03391-SHD-DMF at page 2 (D. Ariz. Oct. 22, 2025)(“while
18 Respondents point to two district court opinions adopting their
19 interpretation of § 1225(b)(2)(A), myriad other district courts have
20 reached the same conclusion as *Echevarria* and held individuals like
21 Petitioner are not subject to mandatory detention under 1225(b)(2)(A)”
22), filed herewith as Exhibit 14.
- 23 j. 10/17/2025 Order granting habeas corpus in *Benitez-Cornejo v. Cantu, et*
24 *al.*, No. 2:25-cv-03672 (D. Arizona Oct. 17, 2025)(“individuals like
25 Petitioner are not “arriving aliens” subject to mandatory detention but,
26 rather, are subject to the general removal statute, 8 U.S.C. § 1226(a)”
27), filed herewith as Exhibit 15.
- 28 k. 10/09/2025 Order granting habeas entered in *Hector Lopez-Melo v. Bondi,*
et. al., Case No. Case 2:25-cv-03394-DJH--JZB (D. Ariz.
10/9/2025)(“petitioner, who had been present in the United States for
years, was not an applicant for admission under 1225(b)(2)(A) or subject
to mandatory detention”), filed herewith as Exhibit 16.

- 1
- 2 1. 10/07/2025 Order granting habeas corpus in *Bo Li v. Cantu, et al.*, No.
- 3 CV-25-02989-PHX-SPL (D Arizona 10/07/2025)(“Respondents maintain
- 4 he is subject to mandatory detention under 1225(b)(2). Again,
- 5 Respondents are mistaken.”), filed herewith as Exhibit 17.
- 6
- 7 m. 10/3/2025 Order granting habeas corpus in *Echevarria v. Bondi, et al.*, No.
- 8 2:25-cv-03252-PHX-DWL, 2025 WL 2821282 (D. Ariz. Oct. 3,
- 9 2025)(“Court agrees with the majority of courts that have concluded that
- 10 § 1226(a), rather than § 1225(b)(2)(A), applies in this circumstance.”),
- 11 filed herewith as Exhibit 18.
- 12
- 13 n. 08/11/2025 Magistrate’s Report and Recommendation in *Rocha Rosado*
- 14 *v. Figueroa*, No. CV-25-02157-PHX-DLR 2025 WL 2349133 at *10 (D.
- 15 Ariz. Aug. 13, 2025)(Magistrate’s Report and Recommendation Adopted
- 16 at 2025 WL 2349133)([t]he text of § 1226, the canons of statutory
- 17 interpretation, this section's legislative history, and longstanding agency
- 18 practice indicate that Rosado is subject to § 1226(a)’s ‘default’ rule for
- 19 discretionary detention rather than § 1225’s mandatory detention
- 20 requirement, and that the IJ erred by finding they did not have jurisdiction
- 21 to consider Rosado's detention.”) *report and recommendation adopted sub*
- 22 *nom.* 2025 WL 2349133 (D. Ariz. Aug. 13, 2025), filed herewith as
- 23 Exhibit 19.

24 33. Petitioner has located only 6 cases holding to the contrary. In *Vargas*

25 *Lopez v. Trump*, --F. Supp. 3d--, 2025 WL 2780351 (D. Neb. Sept. 30, 2025), the court

26 held that Vargas Lopez failed to meet his burden to show that he falls under § 1226(a),

27 so “his Petition fails regardless of the parties’ arguments about the scope of § 1225(b)

28 and § 1226(a).” *Vargas Lopez v. Trump*, 2025 WL 2780351 at *7 (emphasis added). In

Chavez v. Noem, -- F. Supp. 3d --, 2025 WL 2730228 (S.D. Cal. Sept. 24, 2025), the

court denied a temporary restraining order on the grounds that the petitioners had “not

1 demonstrated serious questions about the application of Section 1225 to aliens present
2 in the United States.” *Chavez v. Noem*, 2025 WL 2730228 at *4. However, the court
3 spent less than 2 pages analyzing the statutory language and caselaw before concluding
4 that “Petitioners have not shown either a likelihood of success or serious questions going
5 to the merits [therefore] we do not address the remaining Winter factors.” *Chavez v.*
6 *Noem*, 2025 WL 2730228 at *5. *Mejia Olalde v. Noem*, 2025 U.S. Dist. LEXIS 221830
7 (E.D. Mo. Nov. 10, 2025) was concerned with whether the habeas petition had been
8 properly filed in that court’s jurisdiction and never reached the application of § 1225(b)
9 to the petitioner. *Pipa-Aquise v. Bondi*, No. 25-1094, 2025 WL 2490657 (E.D. Va. Aug.
10 5, 2025) and *Pena v. Hyde*, No. 25-11983, 2025 WL 2108913 (D. Mass. July 28, 2025)
11 were each shorter than two pages long and neither contained any significant analysis.
12 Lastly, in *Lauren-Ayala v. Noem*, No. 25-cv- 04425-KML--JFM (D. Ariz. 12/12/2025).
13 the court did not reach the merits of the habeas claim or analyze the governing statute;
14 instead, it dismissed the petition for lack of jurisdiction, concluding that, because
15 petitioner failed to address the immigration court’s alternative dangerousness finding, it
16 could not order any effective relief. Thus, none of these cases are particularly instructive.

17
18
19
20
21
22 34. In 1997, after Congress amended the INA through the Illegal
23 Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA), EOIR and
24 the then-Immigration and Naturalization Service issued an interim rule to interpret and
25 apply IIRIRA. Specifically, under the heading of “Apprehension, Custody, and
26 Detention of Aliens,” the agencies explained that:
27

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

4 62 Fed. Reg. at 10323 (emphasis added). The agencies thus made clear that
5 individuals who had entered without inspection *were* eligible for consideration for
6 bond and bond hearings before IJs under 8 U.S.C. § 1226 and its implementing
7 regulations.
8

9 35. Thus, for almost 30 years, all participants in the immigration system
10 have understood that people arrested inside the United States generally fall within §
11 1226 for detention purposes and are therefore required to receive a bond hearing upon
12 request—even if they initially entered the country without permission. *See Martinez v.*
13 *Hyde*, No. 25-11613, 2025 WL 2084238, at *4 n.9 (D. Mass. July 24, 2025) (citing the
14 United States Solicitor General’s representation to the Supreme Court at oral argument
15 that “DHS’s long-standing interpretation has been that 1226(a) applies to those who
16 have crossed the border between ports of entry and are shortly thereafter apprehended”).
17
18

19 36. Despite the overwhelming number of federal cases that have ruled
20 against the government’s position, DHS and DOJ are continuing to systemically
21 misclassify people and unlawfully deny them access to bond hearings and release on
22 bond during the pendency of their immigration proceedings.
23
24

25 **CLAIMS FOR RELIEF**
26 **FIRST CLAIM FOR RELIEF**
27 **Violation of Fifth Amendment – Substantive Due Process**

1 37. Petitioner realleges and incorporates herein the allegations contained
2 in the preceding paragraphs of the petition as if fully set forth herein.

3
4 38. The Due Process Clause of the Fifth Amendment forbids the
5 government from depriving any “person” of liberty “without due process of law,”
6 including noncitizens. U.S. Const. amend. V.

7 39. Substantive due process asks whether a person’s life, liberty, or
8 property is deprived without sufficient purpose. There is no question that Petitioner has
9 been deprived of his liberty in this case.

10
11 40. The government’s continued detention of Petitioner is not supported
12 by any special interest or compelling justification that outweighs his liberty interest.

13
14 41. Petitioner’s ongoing detention when so many federal courts have held
15 that he is entitled to be considered for release upon posting an appropriate bond under §
16 1226 constitutes prolonged detention and violates his substantive due process rights.

17
18 **SECOND CLAIM FOR RELIEF**
19 **Violation of Fifth Amendment Right - Procedural Due Process**

20 42. Petitioner realleges and incorporates herein the allegations contained
21 in the preceding paragraphs of the petition as if fully set forth herein.

22
23 43. The Due Process Clause of the Fifth Amendment guarantees Petitioner
24 the right to procedural due process in seeking a bond redetermination and the
25 government may not unreasonably restrict this right.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Shefer Law Firm, P.A.
800 SE 4th. Ave #803
Hallandale Beach, Florida 33009
(786) 295-9077
erica@shefer.legal

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

I represent Petitioner Fidencio Cordero Ramos 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 day December, 2025.

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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	Declaration of Counsel in Support of Petition for Writ of Habeas Corpus
Exhibit 5	Notice to Appear
Exhibit 6	Order granting habeas in <i>Gonzalez-Gonzalez v. Noem</i> , et al., Case No. 25-cv-04478-DWL (D. Ariz. 12-12-25)
Exhibit 7	Order granting habeas in <i>Luna-Gonzalez v. Noem</i> , et al., Case No. 25-cv-03794-PHX (D. Ariz. 11-26-25)
Exhibit 8	Order granting habeas in <i>Padron-Carreron v. Noem</i> , et al., Case No. 25-cv-04204-PHX (D. Ariz. 11-24-25)
Exhibit 9	Order granting habeas in <i>Rodrigues da Silva v. Figueroa</i> , et al., Case No. 25-cv-04015-PHX (D. Ariz. 11-18-25)
Exhibit 10	Order entered <i>Perez Rodriguez v. Noem</i> , et al., Case No. 25-cv-03921-PHX (D. Ariz. 11/13/2025)
Exhibit 11	Order entered <i>Gonzalez Rodriguez v. Bondi</i> , et al., Case No. 25-cv-03917-PHX (D. Ariz. 11-6-25)
Exhibit 12	Order entered in <i>Abrego-Zarate v. Noem</i> , et al., Case No. 25-cv-03564-KML (D. Ariz. 11-6-25)
Exhibit 13	Order entered in <i>Lopez-Cruz v. Noem</i> , et al., No. 2:25-cv-03566-DJH--ASB (D. Ariz. 11/3/2025)
Exhibit 14	Order entered in <i>Garcia-Rosales v. Noem</i> , et al., No. 2:25-cv-03391-SHD—DMF (D. Ariz. Oct. 22, 2025)
Exhibit 15	Order granting habeas corpus in <i>Benitez-Cornejo v. Cantu</i> , et al., No. 2:25-cv-03672 (D. Arizona Oct. 17, 2025)
Exhibit 16	Order entered in <i>Hector Lopez-Melo v. Bondi</i> , et al., 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</i> , et al., No. CV-25-02989-PHX-SPL (D Arizona 10/07/2025)
Exhibit 18	Order entered in <i>Francisco Echevarria v. Pam Bondi</i> , et al.,

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

	CV-25-03252-PHX-DWL (ESW), (D. Ariz. 10/3/2025)
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)