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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

SELVIN DANIEL ESTUARDO MUNOZ  
LEAL, A# [REDACTED]

Case No.

Petitioner,

**PETITION FOR WRIT OF  
HABEAS CORPUS**

v.

Bret BRADFORD, Houston Field Office  
Director for U.S. Immigration and Customs  
Enforcement; Todd LYONS, Acting Director  
for U.S. Immigration and Customs  
Enforcement; Kristi NOEM, Secretary, U.S.  
Department of Homeland Security; U.S.  
DEPARTMENT OF HOMELAND  
SECURITY; Pamela BONDI, U.S. Attorney  
General; EXECUTIVE OFFICE FOR  
IMMIGRATION REVIEW; Randy TATE,  
Warden of Montgomery Processing Center,

Respondents.

1 **INTRODUCTION**

2 1. Petitioner Selvin Daniel Estuardo Munoz Leal brings this petition for a writ of  
3 habeas corpus to seek enforcement of his rights as member of the Bond Denial Class certified in  
4 *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM (C.D. Cal.) Petitioner is in the  
5 physical custody of Respondents at the Montgomery Processing Center in Conroe, Texas. He now  
6 faces unlawful detention because the Department of Homeland Security (DHS) and the Executive  
7 Office for Immigration Review (EOIR) have refused to abide by the declaratory judgment issued  
8 on behalf of the certified class in *Maldonado Bautista v. Santacruz*.

9 2. The Petitioner has been detained since June 17, 2025, and his continued detention  
10 has become unreasonably prolonged. Shortly after detention, Petitioner requested a custody  
11 redetermination. On July 23, 2025, the immigration judge (IJ) denied bond for lack of jurisdiction,  
12 although no controlling precedent existed at that time.

13 3. On June 30, 2025, the Board of Immigration Appeals (BIA) issued a decision on  
14 *Matter of Akhmedov*, where the BIA noted that the Respondent in that case entered the United  
15 States unlawfully in 2022 and arrested at a later date and was therefore detained under 8 U.S.C. §  
16 1226(a). 29 I&N Dec. 166 (BIA 2025). Though the issue in that case was not whether the  
17 Respondent was subject to INA §235(b)(2)(A), the Petitioner used this case to support his stance  
18 that he was detained under 8 U.S.C. § 1226(a) and requested a new custody redetermination  
19 hearing based on changed circumstances, which the IJ granted on August 26, 2025.

20 4. Petitioner was subsequently granted bond by the IJ on September 4, 2025.

21 5. On September 5, 2025, the Board of Immigration Appeals (“BIA”) issued a  
22 precedential decision that unlawfully reinterpreted the Immigration and Nationality Act (“INA”).  
23 *See Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025). Prior to this decision, noncitizens  
24

1 like Petitioner who had lived in the U.S. for many years and were apprehended by Immigration  
2 and Customs Enforcement (“ICE”) in the interior of the country were detained pursuant to 8 U.S.C.  
3 § 1226(a) and eligible to seek bond hearings before Immigration Judges (“IJs”). Instead, in conflict  
4 with nearly thirty years of legal precedent, Petitioner is now considered subject to mandatory  
5 detention under 8 U.S.C. § 1225(b)(2)(A) and has no opportunity for release on bond while his  
6 removal proceedings are pending.

7         6.         The DHS filed an automatic stay preventing the Petitioner from posting bond. On  
8 September 8, 2025 , the DHS appealed the bond decision alleging the IJ did not have jurisdiction  
9 to grant bond. The BIA vacated the IJ’s decision on December 2, 2025, affirming that the Petitioner  
10 was subject to *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025), and thus detained under  
11 INA § 235(b)(2)(A).

12         7.         On September 17, 2025, the Petitioner had a merits hearing, where the IJ ordered  
13 him removed to Guatemala. On October 15, 2025, the Petitioner timely appealed his case to the  
14 BIA, and it currently remains pending.

15         8.         Petitioner’s detention pursuant to § 1225(b)(2)(A) violates the plain language of the  
16 INA and its implementing regulations. Petitioner, who has resided in the U.S. for more than twenty  
17 years and who was apprehended in the interior of the U.S., should not be considered an “applicant  
18 for admission” who is “seeking admission.” Rather, he should be detained pursuant 8 U.S.C. §  
19 1226(a), which allows for release on conditional parole or bond.

20         9.         On November 20, 2025, the district court granted partial summary judgment on  
21 behalf of individual plaintiffs and on November 25, 2025, certified a nationwide class and  
22 extended declaratory judgment to the certified class. *Maldonado Bautista v. Santacruz*, No. 5:25-  
23 CV-01873-SSS-BFM, --- F. Supp. 3d ----, 2025 WL 3289861, at \*11 (C.D. Cal. Nov. 20, 2025)

1 (order granting partial summary judgment to named Plaintiffs-Petitioners); *Maldonado Bautista v.*  
2 *Santacruz*, No. 5:25-CV-01873-SSS-BFM, --- F. Supp. 3d ----, 2025 WL 3288403, at \*9 (C.D.  
3 Cal. Nov. 25, 2025) (order certifying Plaintiffs-Petitioners’ proposed nationwide Bond Eligible  
4 Class, incorporating and extending declaratory judgment from Order Granting Petitioners’ Motion  
5 for Partial Summary Judgment).

6 10. The declaratory judgment held that the Bond Denial Class members are detained  
7 under 8 U.S.C. § 1226(a) and thus may not be denied consideration for release on bond under §  
8 1225(b)(2)(A). *Maldonado Bautista*, 2025 WL 3289861, at \*11.

9 11. The Executive Office for Immigration Review and its subagency the Immigration  
10 Court and the Department of Homeland Security (DHS) have blatantly refused to abide by the  
11 declaratory relief and have unlawfully ordered that Petitioner be denied the opportunity to be  
12 released on bond.

13 12. Petitioner Selvin Daniel Estuardo Munoz Leal is a member of the Bond Eligible  
14 Class, as he:

- 15 a. does not have lawful status in the United States and is currently detained at the  
16 Montgomery Processing Center. He was apprehended by immigration authorities  
17 on June 17, 2025;
- 18 b. entered the United States without inspection over ten (10) years ago and was not  
19 apprehended upon arrival, *cf. id.*; and
- 20 c. is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

21 13. After apprehending Petitioner on June 17, 2025, the DHS placed him in removal  
22 proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Petitioner as being inadmissible under  
23 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection.

24 14. The Court should expeditiously grant this petition.

15. Respondents are bound by the judgment in *Maldonado Bautista*, as it has the full  
“force and effect of a final judgment.” 28 U.S.C. § 2201(a). Nevertheless, Respondents continue

1 to flagrantly defy the judgment in that case and continue to subject Petitioner to unlawful detention  
2 despite his clear entitlement for release on bond as a Bond Eligible Class member.

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

7 17. Continued detention violates the Fifth Amendment’s Due Process Clause, the  
8 Immigration and Nationality Act, and the binding class-wide relief in *Maldonado Bautista*. The  
9 BIA’s decision, vacating the grant of bond, cannot legally sustain detention.

10 18. Because Respondents are detaining Petitioner in violation of the partial summary  
11 judgment issued in *Maldonado Bautista*, the Court should accordingly order that Respondent DHS  
12 must release Petitioner, a member of the Bond Eligible Class, immediately.

13 19. Alternatively, Petitioner seeks declaratory relief that he is subject to detention under  
14 § 1226(a) and its implementing regulations and asks that this Court order Respondents to release  
15 Petitioner from custody immediately.

16 20. Alternatively, Petitioner seeks declaratory relief that he is subject to detention under  
17 § 1226(a) ,the Court should order the Petitioner’s release unless the Respondents provide a bond  
18 hearing under 8 U.S.C. § 1226(a) within forty-eight (48) hours.

19 **CUSTODY**

20 21. Petitioner is currently in the custody of ICE, a branch of the DHS, at the  
21 Montgomery Processing Center in Conroe, Texas. Petitioner is in the physical custody of  
22 Respondents. He is therefore in “‘custody’ of [the DHS] within the meaning of the habeas corpus  
23 statute.” *Jones v. Cunningham*, 371 U.S. 236, 243 (1963); *See* 28 U.S.C. § 2241(c)(5).

1 **JURISDICTION**

2 22. This Court has jurisdiction under 28 U.S.C. § 2241(c)(5) (habeas corpus), 28 U.S.C.  
3 § 1331 (federal question), and Article I, section 9, clause 2 of the United States Constitution (the  
4 Suspension Clause).

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

7 24. Federal district courts have jurisdiction to hear habeas claims by non-citizens  
8 challenging both the lawfulness and the constitutionality of their detention. *See Zadvydas v. Davis*,  
9 533 U.S. 678, 687 (2001).

10 **VENUE**

11 25. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 493-  
12 500 (1973), venue lies in the United States District Court for the Southern District of Texas, the  
13 judicial district in which Petitioner currently is detained.

14 26. Venue is also properly in this Court pursuant to 28 U.S.C. § 1391(e) because  
15 Respondents are either employees or officers of the United States acting in their official capacities,  
16 or agencies of the United States, and because a substantial part of the events or omissions giving  
17 rise to the claims occurred in the Southern District of Texas

18 **REQUIREMENTS OF 28 U.S.C. § 2243**

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

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

4 **PARTIES**

5 29. Petitioner Selvin Daniel Estuardo Munoz Leal is a citizen of Guatemala who has  
6 been in immigration detention since June 17, 2025. Petitioner entered the United States in or  
7 around 2015 without inspection by immigration officials. After Petitioner was arrested in Crosby,  
8 Texas, ICE did not set bond, and Petitioner requested review of his custody by an IJ. On September  
9 4, 2025, the Respondent was granted bond by an IJ. However, the DHS appealed the decision. On  
10 December 2, 2025, the BIA vacated the IJ’s order and found the Respondent was subject to  
11 mandatory detention.

12 30. Respondent Bret Bradford is the Director of the Houston Field Office of ICE’s  
13 Enforcement and Removal Operations division. As such, Bret Bradford is Petitioner’s immediate  
14 custodian and is responsible for Petitioner’s detention and removal. He is sued in his official  
15 capacity.

16 31. Respondent Todd Lyons is the Acting Director for U.S. Immigration and Customs  
17 Enforcement. Mr. Lyons is responsible for overseeing the agency’s operations and ensuring  
18 compliance with immigration laws. He is sued in his official capacity.

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

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

4 34. Respondent Pamela Bondi is the Attorney General of the United States. She is  
5 responsible for the Department of Justice, of which the Executive Office for Immigration Review  
6 and the immigration court system it operates is a component agency. She is sued in her official  
7 capacity.

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

11 36. Respondent Randy Tate is employed by The GEO Group, Inc. as Warden of the  
12 Montgomery Processing Center, where Petitioner is detained. He has immediate physical custody  
13 of Petitioner. He is sued in his official capacity.

14 **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

15 37. Petitioner sought bond redetermination before an Immigration Judge and was granted  
16 bond on September 4, 2025.

17 38. The DHS appealed the grant of bond to the BIA on September 8, 2025.

18 39. On December 2, 2025, the BIA vacated the IJ order granting bond to Petitioner,  
19 holding the Petitioner was detained pursuant to INA § 235(b)(2).

20 **STATEMENT OF FACTS**

21 40. Petitioner is a citizen of Guatemala

22 41. Upon information and belief, the Petitioner has resided in the United States since  
23 2015.

1 42. Petitioner is now detained at Montgomery Processing Center.

2 43. An IJ granted the Petitioner’s bond request on September 4, 2025. The DHS appealed  
3 to the BIA, and the BIA vacated the IJ’s order stating the IJ did not have jurisdiction  
4 to grant bond.

5 44. Without relief from this Court, he faces continued and indefinite detention without a  
6 bond hearing.

7 **LEGAL BACKGROUND**

8 45. The INA prescribes three basic forms of detention for noncitizens in removal  
9 proceedings.

10 46. First, individuals detained pursuant to 8 U.S.C. § 1226(a) are generally entitled to  
11 a bond hearing, unless they have been arrested, charged with, or convicted of certain crimes and  
12 are subject to mandatory detention. *See* 8 U.S.C. §§ 1226(a), 1226(c) (listing grounds for  
13 mandatory detention); *see also* 8 C.F.R. §§ 1003.19(a) (immigration judges may review custody  
14 determinations made by DHS), 1236.1(d) *Id.*

15 47. Second, the INA provides for mandatory detention of noncitizens subject to  
16 expedited removal under 8 U.S.C. § 1225(b)(1) as well as other recent arrivals deemed to be  
17 “seeking admission” under § 1225(b)(2).

18 48. Third, the INA authorizes detention of noncitizens who have received a final order  
19 of removal, including those in withholding-only proceedings. *See* 8 U.S.C. § 1231(a)–(b).

20 49. The detention provisions at § 1226(a) and § 1225(b)(2) were enacted as part of the  
21 Illegal Immigration Reform and Immigrant Responsibility Act (“IIRIRA”) of 1996, Pub. L. No.  
22 104-208, Div. C, §§ 302–03, 110 Stat. 3009-546, 3009–582 to 3009–583, 3009–585. Following  
23 IIRIRA, the Executive Office for Immigration Review (“EOIR”) issued regulations clarifying that  
24 individuals who entered the country without inspection were not considered detained under § 1225,  
but rather under § 1226(a). *See Inspection and Expedited Removal of Aliens; Detention and*

1 *Removal of Aliens; Conduct of Removal Proceedings; Asylum Procedures*, 62 Fed. Reg. 10312,  
2 10323 (Mar. 6, 1997) (“Despite being applicants for admission, aliens who are present without  
3 having been admitted or paroled (formerly referred to as aliens who entered without inspection)  
4 will be eligible for bond and bond redetermination”).

5 50. Thus, in the decades that followed, most people who entered without inspection  
6 and were thereafter detained and placed in standard removal proceedings were considered for  
7 release on bond and also received bond hearings before an Immigration Judge (“IJ”), unless their  
8 criminal history rendered them ineligible. That practice was consistent with many more decades  
9 of prior practice, in which noncitizens who had entered the United States, even if without  
10 inspection, were entitled to a custody hearing before an IJ or other hearing officer. In contrast,  
11 those who were stopped at the border were only entitled to release on parole. *See* 8 U.S.C. §  
12 1225(a) (1994); see also H.R. Rep. No. 104-469, pt. 1, at 220 (1996) (noting that § 1226(a) simply  
13 “restates” the detention authority previously found at § 1225(a)).

14 51. For decades, long-term residents of the U.S. who entered without inspection and  
15 were subsequently apprehended by ICE in the interior of the country have been detained pursuant  
16 to § 1226 and entitled to bond hearings before an IJ, unless barred from doing so due to their  
17 criminal history.

18 52. In July 2025, however, ICE began asserting that all individuals who entered without  
19 inspection should be considered “seeking admission” and therefore subject to mandatory detention  
20 under 8 U.S.C. § 1225(b)(2)(A).

21 53. On September 5, 2025, the BIA issued a precedential decision adopting this  
22 interpretation, departing from the INA’s text, federal precedent, and existing regulations. *Matter*  
23 *of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025).



1 1226(c)(1)(E)).

2 58. By specifically referencing inadmissibility for entry without inspection under 8  
3 U.S.C. § 1182(6)(A), Congress made clear that such individuals are otherwise covered by §  
4 1226(a). Thus, § 1226 plainly applies to noncitizens charged as inadmissible, including those  
5 present without admission or parole.

6 59. The Supreme Court has explained that § 1225(b) is concerned “primarily [with  
7 those] seeking entry,” and is generally imposed “at the Nation’s borders and ports of entry, where  
8 the Government must determine whether [a noncitizen] seeking to enter the country is admissible.”  
9 *Jennings v. Rodriguez*, 583 U.S. 281, 297, 2987 (2018). In contrast, Section 1226 “authorizes the  
10 Government to detain certain aliens *already in the country* pending the outcome of removal  
11 proceedings.” *Id.* at 289 (emphases added).

12 60. Furthermore, § 1225(b)(2) specifically applies only to those “seeking admission,”  
13 and the implementing regulations at 8 C.F.R. § 1.2 address noncitizens who are “coming or  
14 attempting to come into the United States.” The use of the present progressive tense would exclude  
15 noncitizens like Petitioner who are apprehended in the interior years after they entered, as they are  
16 no longer “seeking admission” or “coming [...] into the United States.” *See Martinez v. Hyde*,  
17 2025 WL 2084238 at \*6 (D. Mass. July 24, 2025) (citing the use of present and present progressive  
18 tense to support conclusion that INA § 1225(b)(2) does not apply to individuals apprehended in  
19 the interior); *see also Al Otro Lado v. McAleenan*, 394 F. Supp. 3d 1168, 1200 (S.D. Cal. 2019)  
20 (construing “is arriving” in INA § 235(b)(1)(A)(i) and observing that “[t]he use of the present  
21 progressive, like use of the present participle, denotes an ongoing process”).

22 61. Accordingly, the mandatory detention provision of § 1225(b)(2) does not apply to  
23 Petitioner, who entered the United States approximately ten (10) years ago.

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**CLAIM FOR RELIEF**

**Claim 1: Violation of the INA:  
Request for Relief Pursuant to *Maldonado Bautista***

62. Petitioner repeats, re-alleges, and incorporates by reference paragraphs 1-60.

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

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

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

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

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

**Claim II: Violation of the Bond Regulations:  
8 C.F.R. §§ 236.1, 1236.1 and 1003.19 Unlawful Denial of Release on Bond**

68. Petitioner repeats, re-alleges, and incorporates by reference paragraphs 1-60.

69. In 1997, after Congress amended the INA through IIRIRA, EOIR and the then-Immigration and Naturalization Service (“INS”) issued an interim rule to interpret and apply IIRIRA. Specifically, under the heading of “Apprehension, Custody, and Detention of [Noncitizens],” the agencies explained that “[d]espite being applicants for admission, [noncitizens] who are present without having been admitted or paroled (formerly referred to as [noncitizens]

1 who entered without inspection) will be eligible for bond and bond redetermination.” 62 Fed. Reg.  
2 at 10323. The agencies thus made clear that individuals who had entered without inspection were  
3 eligible for consideration for bond and bond hearings before IJs under 8 U.S.C. § 1226 and its  
4 implementing regulations.

5 70. The application of § 1225(b)(2) to Petitioner unlawfully mandates his continued  
6 detention and violates 8 C.F.R. §§ 236.1, 1236.1, and 1003.19.

7 **Claim 3: Improper Application of 8 U.S.C § 1225(b)(2)**  
8 **Unlawful Detention Under This Provision**

9 71. Petitioner repeats, re-alleges, and incorporates by reference paragraphs 1-60.

10 72. Title 8 U.S.C. § 1225(b) is concerned primarily with those seeking entry to the  
11 United States and is generally imposed at the Nation’s borders and ports of entry, where the  
12 Government must determine whether a noncitizen seeking to enter the country is admissible.

13 73. Upon information and belief, Petitioner has resided in the U.S. since 2004. He is  
14 therefore neither an arriving alien nor an alien who is now seeking admission to the United States.

15 74. Because 8 U.S.C. § 1225(b) does not apply to Petitioner, Respondents’ detention  
16 of him under this provision is unlawful.

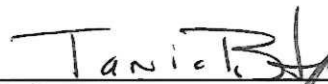
17 **Claim 4: Violation of the Fifth Amendment’s Due Process Clause**

18 75. Petitioner repeats, re-alleges, and incorporates by reference paragraphs 1-60.

19 76. The Fifth Amendment guarantees liberty and requires that immigration detention  
20 be reasonably related to a legitimate governmental purpose. Petitioner’s detention, in light of the  
21 previous bond order, and the BIA’s decision to vacate the immigration judge’s order, is arbitrary  
22 and capricious.

23 77. Under the Fifth Amendment to the United States Constitution, those threatened  
24 with the loss of liberty or property due to actions by the federal government are entitled to due  
process of law.





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*Attorney for Petitioner*

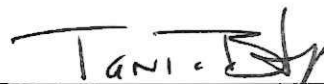
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**VERIFICATION BY SOMEONE ACTING ON PETITIONER'S BEHALF PURSUANT  
TO 28 U.S.C. § 2242**

I am submitting this verification on behalf of the Petitioner because I am the attorney for Petitioner. I or my co-counsel have discussed with the Petitioner the events described in this Petition. Based on those discussions, I hereby verify that the statements made in the attached Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated: December 16, 2025.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tania Buitron", written over a horizontal line.

Tania Buitron  
*Counsel for Petitioner*

**CERTIFICATE OF SERVICE**

I, undersigned counsel, hereby certify that on this date, I filed this Petition for Writ of Habeas Corpus and all attachments using the CM/ECF system. My co-counsel will furthermore mail a copy by USPS Certified Priority Mail with Return Receipts to each of the following individuals:

Bret Bradford  
Houston Field Office Director of Enforcement and Removal Operations  
126 Northpoint Drive  
Houston, TX 77060

Todd Lyons  
Acting Field Director for U.S. Immigration and Customs Enforcement  
500 12th St SW  
Washington, DC 20536

Kristi Noem  
Secretary of Homeland Security  
MS 0525 Department of Homeland Security  
2707 Martin Luther King Jr Ave SE  
Washington, DC 20528-0525

Pamela Bondi  
U.S. Attorney General  
U.S. Department of Justice  
950 Pennsylvania Avenue NW  
Washington DC 20530-0001

Randy Tate  
Warden of Montgomery Processing Center  
806 Hilbig Road Conroe, TX 77301

Dated: December 16, 2025.

Respectfully submitted,

  
\_\_\_\_\_  
Tania Buitron  
*Counsel for Petitioner*