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IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

ALAN SILVA FERREIRA

Petitioner,

v.

Brian MCSHANE, Field Office Director of
Enforcement and Removal Operations,
Philadelphia Field Office, 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;

Jamal LAWRENCE, Warden of
PHILADELPHIA FEDERAL DETENTION
CENTER

Respondents.

Case No. 25-cv-7335

**PETITION FOR WRIT OF
HABEAS CORPUS**

INTRODUCTION

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1. Petitioner, Alan Silva Ferreira, is in the physical custody of Respondents at the Philadelphia Federal Detention Center. He now faces unlawful detention because the Department of Homeland Security (DHS) and the Executive Office of Immigration Review (EOIR) have concluded Petitioner is subject to mandatory detention.

2. Petitioner entered the United States without inspection over twenty (20) years ago, and has not had contact with immigration officials until he was arrested and detained outside of an elementary school on December 19, 2025, after dropping his girlfriend's son off at the school.

3. DHS has not yet filed the necessary Form I-862 - Notice to Appear (NTA) to commence Peitioner's proceedings with EOIR. The NTA confirms DHS's charges against Petitioner.

4. Petitioner has not been scheduled for a hearing in the immigration court at this time.

5. DHS's decision to detain Petitioner, without release from immigration custody, is consistent with a new DHS policy issued on July 8, 2025, instructing all Immigration and Customs Enforcement (ICE) employees to consider anyone inadmissible under § 1182(a)(6)(A)(i)—i.e., those who entered the United States without admission or inspection—to be subject to detention under 8 U.S.C. § 1225(b)(2)(A) and therefore ineligible to be released on bond.

6. Similarly, on September 5, 2025, the Board of Immigration Appeals (BIA or Board) issued a precedent decision, binding on all immigration judges, holding that an immigration judge has no authority to consider bond requests for any person who entered the

1 United States without admission. *See Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025).
2 The Board determined that such individuals are subject to detention under 8 U.S.C. §
3 1225(b)(2)(A) and therefore ineligible to be released on bond.

4 7. Petitioner's detention on this basis violates the plain language of the Immigration
5 and Nationality Act. Section 1225(b)(2)(A) does not apply to individuals like Petitioner.

6 8. Petitioner argues that he was detained under § 8 U.S.C. 1226(a), which allows for
7 release on conditional parole or bond. That statute expressly applies to people who, like
8 Petitioner, are charged as inadmissible for having entered the United States without inspection
9 and are residing inside the United States.

10 9. Respondents' new legal interpretation is plainly contrary to the statutory
11 framework and contrary to decades of agency practice applying § 1226(a) to people like
12 Petitioner.

13 10. Accordingly, Petitioner seeks a writ of habeas corpus requiring that he be
14 released. In the alternative, Petitioner requests that Respondents provide a bond hearing under §
15 1226(a) within seven days.

16 JURISDICTION

17 11. Petitioner is in the physical custody of Respondents. Petitioner is detained at the
18 Federal Detention Center in Philadelphia, Pennsylvania.

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

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

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1 **VENUE**

2 14. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 493-
3 500 (1973), venue lies in the United States District Court for the Eastern District of
4 Pennsylvania, the judicial district in which Petitioner currently is detained.

5 15. Venue is also properly in this Court pursuant to 28 U.S.C. § 1391(e) because
6 Respondents are employees, officers, and agencies of the United States, and because a
7 substantial part of the events or omissions giving rise to the claims occurred in the Eastern
8 District.

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

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

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

20 **PARTIES**

21 18. Petitioner, Alan Silva Ferreira, is a citizen of Brazil who has been in immigration
22 detention since December 19, 2025. After arresting Petitioner outside of Solomon Solis-Cohen
23 Elementary School, where he was dropping his girlfriend’s son off, ICE did not set bond.
24

1 Petitioner is unable to formally request bond by an IJ, as DHS has not yet filed his NTA despite
2 Petitioner's detention for one (1) week. This means that immigrations proceedings against
3 Respondent have not formally commenced with the Executive Office for Immigration Review
4 (EOIR), and Petitioner's counsel cannot file a bond request or even access government
5 documents relating to Petitioner's detention. Even if the NTA had been filed, Petitioner is unable
6 to obtain review of his custody by an IJ, pursuant to the Board's decision in *Matter of Yajure*
7 *Hurtado*, 29 I. & N. Dec. 216 (BIA 2025).

8 19. Respondent, Brian McShane, is the Director of the Philadelphia Field Office of
9 ICE's Enforcement and Removal Operations division. As such, Brian McShane is Petitioner's
10 immediate custodian and is responsible for Petitioner's detention and removal. He is named in
11 his official capacity.

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

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

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

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1 23. Respondent, Executive Office for Immigration Review (EOIR), is the federal
2 agency responsible for implementing and enforcing the INA in removal proceedings, including
3 for custody redeterminations in bond hearings.

4 24. Respondent, Jamal Lawrence, is employed by the Bureau of Prisons as Warden of
5 the Federal Detention Center where Petitioner is detained. Mr. Lawrence has immediate physical
6 custody of Petitioner. He is sued in his official capacity.

7 **LEGAL FRAMEWORK**

8 25. The INA prescribes three basic forms of detention for the vast majority of
9 noncitizens in removal proceedings.

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

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

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

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

21 30. The detention provisions at § 1226(a) and § 1225(b)(2) were enacted as part of the
22 Illegal Immigration Reform and Immigrant Responsibility Act (IIRIRA) of 1996, Pub. L. No.
23 104–208, Div. C, §§ 302–03, 110 Stat. 3009–546, 3009–582 to 3009–583, 3009–585. Section
24

1 1226(a) was most recently amended earlier this year by the Laken Riley Act, Pub. L. No.119-1,
2 139 Stat. 3 (2025).

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

8 32. Thus, in the decades that followed, most people who entered without inspection
9 and were placed in standard removal proceedings received bond hearings, unless their criminal
10 history rendered them ineligible pursuant to 8 U.S.C. § 1226(c). That practice was consistent
11 with many more decades of prior practice, in which noncitizens who were not deemed “arriving”
12 were entitled to a custody hearing before an IJ or other hearing officer. *See* 8 U.S.C. § 1252(a)
13 (1994); *see also* H.R. Rep. No. 104-469, pt. 1, at 229 (1996) (noting that § 1226(a) simply
14 “restates” the detention authority previously found at § 1252(a)). Even individuals who were
15 apprehended at the border and not immediately detained but placed in standard removal
16 proceedings under 8 U.S.C. § 1229a, would historically have been considered detained under
17 § 1226(a) should they later be detained in the interior of the U.S., and thus eligible for bond
18 before an immigration judge.

19 33. On July 8, 2025, ICE, “in coordination with” DOJ, announced a new policy that
20 rejected well-established understanding of the statutory framework and reversed decades of
21 practice.

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

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

10 36. This followed a May 15, 2025, decision by the BIA holding an applicant for
11 admission arrested without a warrant while arriving in the United States and subsequently placed
12 into removal proceedings is detained under 8 U.S.C. § 1225(b). *Matter of Q. Li*, 29 I&N Dec. 66
13 (BIA 2025).

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

17 38. Subsequently, court after court has adopted the same reading of the INA’s
18 detention authorities and rejected ICE and EOIR’s new interpretation. *See, e.g., Rodriguez*
19 *Vazquez v. Bostock*, 779 F. Supp. 3d 1239 (W.D. Wash. 2025); *Gomes v. Hyde*, No. 1:25-CV-
20 11571-JEK, 2025 WL 1869299 (D. Mass. July 7, 2025); *Diaz Martinez v. Hyde*, No. CV 25-
21 11613-BEM, --- F. Supp. 3d ----, 2025 WL 2084238 (D. Mass. July 24, 2025); *Rosado v.*
22 *Figueroa*, No. CV 25-02157 PHX DLR (CDB), 2025 WL 2337099 (D. Ariz. Aug. 11, 2025),

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

1 *report and recommendation adopted*, No. CV-25-02157-PHX-DLR (CDB), 2025 WL 2349133
2 (D. Ariz. Aug. 13, 2025); *Lopez Benitez v. Francis*, No. 25 CIV. 5937 (DEH), 2025 WL
3 2371588 (S.D.N.Y. Aug. 13, 2025); *Maldonado v. Olson*, No. 0:25-cv-03142-SRN-SGE, 2025
4 WL 2374411 (D. Minn. Aug. 15, 2025); *Arrazola-Gonzalez v. Noem*, No. 5:25-cv-01789-ODW
5 (DFMx), 2025 WL 2379285 (C.D. Cal. Aug. 15, 2025); *Romero v. Hyde*, No. 25-11631-BEM,
6 2025 WL 2403827 (D. Mass. Aug. 19, 2025); *Samb v. Joyce*, No. 25 CIV. 6373 (DEH), 2025
7 WL 2398831 (S.D.N.Y. Aug. 19, 2025); *Ramirez Clavijo v. Kaiser*, No. 25-CV-06248-BLF,
8 2025 WL 2419263 (N.D. Cal. Aug. 21, 2025); *Leal-Hernandez v. Noem*, No. 1:25-cv-02428-
9 JRR, 2025 WL 2430025 (D. Md. Aug. 24, 2025); *Kostak v. Trump*, No. 3:25-cv-01093-JE-
10 KDM, 2025 WL 2472136 (W.D. La. Aug. 27, 2025); *Jose J.O.E. v. Bondi*, No. 25-CV-3051
11 (ECT/DJF), --- F. Supp. 3d ----, 2025 WL 2466670 (D. Minn. Aug. 27, 2025) *Lopez-Campos v.*
12 *Raycraft*, No. 2:25-cv-12486-BRM-EAS, 2025 WL 2496379 (E.D. Mich. Aug. 29, 2025);
13 *Vasquez Garcia v. Noem*, No. 25-cv-02180-DMS-MM, 2025 WL 2549431 (S.D. Cal. Sept. 3,
14 2025); *Zaragoza Mosqueda v. Noem*, No. 5:25-CV-02304 CAS (BFM), 2025 WL 2591530 (C.D.
15 Cal. Sept. 8, 2025); *Pizarro Reyes v. Raycraft*, No. 25-CV-12546, 2025 WL 2609425 (E.D.
16 Mich. Sept. 9, 2025); *Sampiao v. Hyde*, No. 1:25-CV-11981-JEK, 2025 WL 2607924 (D. Mass.
17 Sept. 9, 2025); *see also, e.g., Palma Perez v. Berg*, No. 8:25CV494, 2025 WL 2531566, at *2
18 (D. Neb. Sept. 3, 2025) (noting that “[t]he Court tends to agree” that § 1226(a) and not §
19 1225(b)(2) authorizes detention); *Jacinto v. Trump*, No. 4:25-cv-03161-JFB-RCC, 2025 WL
20 2402271 at *3 (D. Neb. Aug. 19, 2025) (same); *Anicasio v. Kramer*, No. 4:25-cv-03158-JFB-
21 RCC, 2025 WL 2374224 at *2 (D. Neb. Aug. 14, 2025) (same).

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

4 40. Section 1226(a) applies by default to all persons "pending a decision on whether
5 the [noncitizen] is to be removed from the United States." These removal hearings are held under
6 § 1229a, to "decid[e] the inadmissibility or deportability of a[] [noncitizen]."

7 41. The text of § 1226 also explicitly applies to people charged as being inadmissible,
8 including those who entered without inspection. *See* 8 U.S.C. § 1226(c)(1)(E). Subparagraph
9 (E)'s reference to such people makes clear that, by default, such people are afforded a bond
10 hearing under subsection (a). As the *Rodriguez Vazquez* court explained, "[w]hen Congress
11 creates 'specific exceptions' to a statute's applicability, it 'proves' that absent those exceptions,
12 the statute generally applies." *Rodriguez Vazquez*, 779 F. Supp. 3d at 1257 (citing *Shady Grove*
13 *Orthopedic Assocs., P.A. v. Allstate Ins. Co.*, 559 U.S. 393, 400 (2010)); *see also* *Gomes*, 2025
14 WL 1869299, at *7.

15 42. Section 1226 therefore leaves no doubt that it applies to people who face charges
16 of being inadmissible to the United States, including those who are present without admission or
17 parole.

18 43. By contrast, § 1225(b) applies to people arriving at U.S. ports of entry or who
19 recently entered the United States. The statute's entire framework is premised on inspections at
20 the border of people who are "seeking admission" to the United States. 8 U.S.C.
21 § 1225(b)(2)(A). Indeed, the Supreme Court has explained that this mandatory detention scheme
22 applies "at the Nation's borders and ports of entry, where the Government must determine
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1 whether [a] [noncitizen] seeking to enter the country is admissible.” *Jennings v. Rodriguez*, 583
2 U.S. 281, 287 (2018).

3 44. Immigration officials and the Department of Justice (DOJ) have long taken the
4 position that immigration officials have broad discretion not to apply the detention and expedited
5 removal procedures § 1225(b), and whether to classify individuals encountered inside the United
6 States shortly after crossing the border as subject to § 1225(b) detention or § 1226(a) detention.
7 *See* Brief for Petitioners at 4-7 (No. 21-954), *Biden v. Texas*, 597 U.S. 785 (2022). The DOJ has
8 stated, “[t]he INA affords DHS multiple options for processing applications for admission,” and
9 that includes arrest and detention pursuant to § 1226(a). *See id.* at 4-5.

10 45. Accordingly, the mandatory detention provision of § 1225(b)(2)(A) does not
11 apply to people like Petitioner, who were detained and released by ICE on their own
12 recognizance pursuant to § 1226(a) before being re-detained by ICE sometime later while living
13 in the United States.

14
15 **FACTS**

16 46. Petitioner has resided in the United States for over twenty (20) years and lives in
17 Philadelphia, Pennsylvania.

18 47. Petitioner has not had any immigration contact since entering the United States.

19 48. Petitioner is the father of two (2) children who are United States Citizens (USCs).
20 Petitioner’s eldest child is eighteen (18) years old. The youngest child is ten (10) years old.

21 49. Petitioner divorced the mother of his two USC children in 2024 after seven (7)
22 years of marriage, and is now in a new relationship. Petitioner now provides care for a third
23 child, his girlfriend’s biological son.

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1 50. Petitioner has no criminal history and has only received a single traffic citation
2 since entering the United States.

3 51. On December 19, 2025, Petitioner was arrested immediately after dropping his
4 girlfriend's son off at his elementary school.

5 52. Petitioner was arrested with no prior contact from officials. As stated above,
6 Petitioner had no criminal history or reason to expect to be arrested, let alone physically
7 manhandled by ICE officers.

8 53. DHS has not yet filed the necessary Form I-862 - Notice to Appear (NTA) to
9 commence Peitioner's proceedings with EOIR. Accordingly, Petitioner is not scheduled for a
10 hearing and has not formally been placed in removal proceedings despite having been detained
11 for one (1) week.

12 54. Due to Petitioner's time spent in the United States, and the fact that he has
13 qualifying USC relatives, Petitioner is eligible for Cancellation of Removal proceedings pursuant
14 to 8 U.S.C. § 1229b.

15 55. Additionally, Petitioner will be eligible to adjust status to become a legal
16 permanent resident in the future once his eldest child turns twenty-one (21) years old via I-130
17 and I-485 Petitions with USCIS.

18 56. Petitioner has lived a law-abiding life since his arrival in the United States. He is a
19 caring father to two USC children and has never been criminally arrested or apprehended by law
20 enforcement, apart from his immigration arrest, and has become a valued member of his
21 community. Petitioner is neither a flight risk nor a danger to the community.

22 57. Petitioner remains in custody with no immigration hearing schedule, and no
23 ability to request bond, as DHS has not filed an NTA.
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1 58. Further, pursuant to *Matter of Yajure Hurtado*, the immigration judge is unable to
2 consider Petitioner's bond request because he entered the United States without inspection.

3 59. As a result, Petitioner remains in detention. Without relief from this court, he
4 faces the prospect of months, or even years, in immigration custody, separated from his extended
5 family and community.

6
7 **CLAIMS FOR RELIEF**

8 **COUNT I**

9 **Violation of the INA**

10 60. Petitioner incorporates by reference the allegations of fact set forth in the
11 preceding paragraphs.

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

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

20 **COUNT II**

21 **Violation of the Bond Regulations**

22 63. Petitioner incorporates by reference the allegations of fact set forth in preceding
23 paragraphs.

24 64. In 1997, after Congress amended the INA through IIRIRA, EOIR and the then-
Immigration and Naturalization Service issued an interim rule to interpret and apply IIRIRA.

1 Specifically, under the heading of “Apprehension, Custody, and Detention of [Noncitizens],” the
2 agencies explained that “[d]espite being applicants for admission, [noncitizens] who are present
3 without having been admitted or paroled (formerly referred to as [noncitizens] who entered
4 without inspection) will be eligible for bond and bond redetermination.” 62 Fed. Reg. at 10323
5 (emphasis added). The agencies thus made clear that individuals who had entered without
6 inspection were eligible for consideration for bond and bond hearings before IJs under 8 U.S.C. §
7 1226 and its implementing regulations.

8 65. Nonetheless, pursuant to *Matter of Yajure Hurtado*, EOIR has a policy and
9 practice of applying § 1225(b)(2) to individual like Petitioner.

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

12 **COUNT III**
Violation of Due Process

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

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

19 69. Petitioner has a fundamental interest in liberty and being free from official
20 restraint.

21 70. The government’s detention of Petitioner without a bond redetermination hearing
22 to determine whether he is a flight risk or danger to others violates his right to due process.
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1 **PRAYER FOR RELIEF**

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

- 3 a. Assume jurisdiction over this matter;
- 4 b. Order that Petitioner shall not be transferred outside the Eastern District of
5 Pennsylvania while this habeas petition is pending;
- 6 c. Issue an Order to Show Cause ordering Respondents to show cause why this
7 Petition should not be granted within three days;
- 8 d. Issue a Writ of Habeas Corpus requiring that Respondents release Petitioner or, in
9 the alternative, provide Petitioner with a bond hearing pursuant to 8 U.S.C. §
10 1226(a) within seven days;
- 11 e. Declare that Petitioner is detained pursuant to 8 U.S.C. § 1226(a);
- 12 f. Declare that Petitioner’s detention is unlawful;
- 13 g. Award Petitioner attorney’s fees and costs under the Equal Access to Justice Act
14 (“EAJA”), as amended, 28 U.S.C. § 2412, and on any other basis justified under
15 law; and
- 16 h. Grant any other and further relief that this Court deems just and proper.

17 DATED this 26th of December 2025.

18 /s/ Conor Deane
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IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

ALAN SILVA FERREIRA

v.

NOEM, ET AL.

Case No. 25-cv-7355

**PETITION FOR WRIT OF
HABEAS CORPUS**

EXHIBIT LIST

<u>Exhibit</u>	<u>Page</u>
A. Printout of ICE Detainee Locator, evincing Petitioner is housed at the Federal Detention Center in Philadelphia.;	1
A. Printout of the Automated Case Information System, evincing that Petitioner’s case is not registered in the EOIR system because no case can be found related to Petitioner’s Alien Number;	3