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

12 **Dumitru Nicolae,**  
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 Service Processing Center, in his official  
25 capacity,

26 **Respondents.**

Case No.

Agency No. 

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

27 **INTRODUCTION**

28 The Respondents are unlawfully detaining Petitioner Dumitru Nicolae, at the  
Florence Service Processing 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

1 Applications for Admission filed herewith as Exhibit 1. The Bureau of Immigration  
2 Appeals (BIA) issued a precedential decision on September 5, 2025, holding that all  
3 noncitizens present in the United States without admission – no matter how long they  
4 have resided here – are still “applicants for admission” under 8 U.S.C. § 1225(a) and  
5 not entitled to bond hearings because they are subject to mandatory detention under §  
6 1225(b)(2)(A). *See, Matter of Yajure Hurtado*, 29 I&N Dec. 216 (B.I.A. 2025) filed  
7 herewith as Exhibit 2.  
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10 But this interpretation of the Immigration and Naturalization Act (INA) violates  
11 both procedural and substantive Fifth Amendment protections, ignores the plain  
12 statutory language of both § 1225 and § 1226, and is contrary to numerous recent Federal  
13 Court decisions in this District that have rejected these exact arguments. *See e.g.*  
14 *10/3/2025 Order entered in Francisco Echevarria v. Pam Bondi, et al., CV-25-03252-*  
15 *PHX-DWL (ESW), (D. Ariz. 10/3/2025)*, filed herewith as Exhibit 16.  
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18 Respondent entered the United States in February 2022 and was served with a  
19 Notice to Appear. *See, Notice to Appear*, filed herewith as exhibit 5. He was released  
20 into the United States pending removal proceedings. In September 2025, Respondent  
21 was arrested during an immigration enforcement operation and detained. *See,*  
22 *Declaration of Counsel in Support of Petition for Writ of Habeas Corpus*, filed herewith  
23 as Exhibit 4. On December 15, 2025, Respondent submitted an application for asylum,  
24 which remains pending before the Immigration Court. *See, Cover for Petitioner’s*  
25 *Application for Asylum and for Withholding of Removal*, filed herewith as Exhibit 5.  
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1 Further, when Respondents issued a Notice to Appear, they did not select any  
2 designation identifying Petitioner as an arriving alien, an alien admitted to the United  
3 States, or an alien present without admission. *See*, Notice to Appear, filed herewith as  
4 Exhibit 5. Instead, Respondents alleged only that Petitioner was not admitted at the time  
5 of entry and was not in possession of a valid entry document. *Id.* The Notice to Appear  
6 further reflects that Petitioner entered the United States in February 2022, confirming  
7 that he was already present in the country and not an arriving alien. *Id.* Nevertheless,  
8 because DHS alleges that Petitioner entered without inspection, the Immigration Court  
9 has concluded that it lacks jurisdiction to conduct a bond hearing, relying on controlling  
10 authority holding that entry without inspection forecloses bond jurisdiction, including  
11 *Yahure-Hurtado*. As a result, Petitioner remains detained without access to a bond  
12 hearing, despite DHS's own acknowledgment that he is not an arriving alien.

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17 In addition to BIA decisions not being binding precedent upon this Court, the  
18 Supreme Court decision last year in *Loper Bright Enterprises v. Raimondo*, 603 U.S.  
19 369, 400 (2024), made clear that federal courts must independently interpret statutes and  
20 no longer defer under so-called "Chevron deference." This Court is therefore in the best  
21 position to determine whether the Respondents are misinterpreting the relevant federal  
22 statutes and improperly denying alien detainees bond hearings on the grounds that they  
23 are all subject to mandatory detention under § 1225(b)(2)(A). The petition for writ of  
24 habeas corpus should be granted.

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27 **JURISDICTION & CUSTODY**

1           1.           Petitioner Dumitru Nicolae, is in the physical custody of Respondents  
2 and Immigration and Customs Enforcement (ICE), an agency within the Department of  
3 Homeland Security.  
4

5           2.           Petitioner is currently detained at Florence Service Processing Center  
6 and is under the direct control of Respondents and their agents.  
7

8           3.           This action arises under the Constitution of the United States and 8  
9 U.S.C. § 1101 et seq.  
10

11           4.           This Court has jurisdiction under 28 U.S.C. § 2241, Art. I § 9, cl. 2 of  
12 the United States Constitution, 28 U.S.C. § 1331, and the common law. This Court may  
13 grant relief pursuant to 28 U.S.C. § 2241, the Declaratory Judgment Act, 28 U.S.C. §  
14 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.  
15

16           5.           Congress has preserved judicial review of challenges to immigration  
17 detention. *See Jennings v. Rodriguez*, 583 U.S. 122, 130-131 (2018) (holding that 8  
18 U.S.C. §§ 1226(e) and 1252(b)(9) do not bar review of challenges to prolonged  
19 immigration detention).  
20

21           6.           The Court must grant the petition for writ of habeas corpus or order  
22 Respondents to show cause “forthwith,” unless the petitioner is not entitled to relief. 28  
23 U.S.C. § 2243. If an order to show cause is issued, Respondents must file a return  
24 “within three days unless for good cause additional time, not exceeding twenty days, is  
25 allowed.” *Id.*  
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1 including those relating to the detention of immigrants during their removal procedures.  
2 Respondent Lyons is a legal custodian of Petitioner. Respondent Lyons is sued in his  
3 official capacity.  
4


5 14. Respondent ICE is a federal law enforcement agency within DHS.  
6 Respondent ICE is responsible for the enforcement of immigration laws, including the  
7 detention and removal of immigrants. Respondent ICE is a legal custodian of Petitioner.  
8

9 15. Respondent John Cantu is Field Office Director for ICE's Enforcement  
10 and Removal Operation's ("ERO") Field Office. Respondent Cantu is a legal custodian  
11 of Petitioner and is sued in his official capacity.  
12

13 16. Respondent Luis Rosa, Jr. is the Warden of the Florence Service  
14 Processing Center. Respondent Rosa, Jr. is a legal custodian of Petitioner. Respondent  
15 Rosa, Jr. is sued in his official capacity.  
16

17 17. Respondent Sirce Owen is the Acting Director of the Executive Office  
18 for Immigration Review (EOIR), a federal agency within the U.S. Department of Justice.  
19 Respondent EOIR is responsible for the administration of immigration courts, and  
20 acceptance of forms and petitions related to adjudication of immigration claims, as well  
21 as motions for bond. Respondent Sirce Owen is sued in her official capacity.  
22

### 23 STATEMENT OF FACTS

24 18. Petitioner Dumitru Nicolae was born on  in Craeova,  
25 Romania.  
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1 is therefore reasonable to read these statutes “against [that] backdrop.” *See Hewitt v.*  
2 *United States*, 605 U.S. —, 145 S. Ct. 2165, 2173 (2025).

3  
4 26. Due process thus requires “adequate procedural protections” to ensure  
5 that the government’s asserted justification for a noncitizen’s physical confinement  
6 “outweighs the individual’s constitutionally protected interest in avoiding physical  
7 restraint.” *Zadvydas*, 533 U.S. at 690 (internal quotation marks omitted).

8  
9 27. In the immigration context, the Supreme Court has recognized only  
10 two valid purposes for civil detention: to mitigate the risks of danger to the community  
11 and to prevent flight. *Id.*; *Demore*, 538 U.S. at 528. The government may not detain a  
12 noncitizen based on any other justification.

13  
14 28. Congress has granted the Attorney General discretion to decide  
15 whether to detain or release certain noncitizens pending a removal decision. *See* 8 U.S.C.  
16 § 1226(a). The Attorney General has delegated that authority to IJs. 8 C.F.R. §§ 1003.19,  
17 1236.1.

18  
19 29. On July 8, 2025, DHS adopted a new policy on mandatory detention  
20 for noncitizens who have been residing in the United States. *See*, ICE Memo: Interim  
21 Guidance Regarding Detention Authority for Applications for Admission filed herewith  
22 as Exhibit 1.

23  
24 30. On September 5, 2025, the BIA entered the precedential decision  
25 *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (B.I.A. 2025), filed herewith as Exhibit 2,  
26 which holds that all noncitizens who enter without inspection are “applicants for  
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1 admission" under 8 U.S.C. § 1225(a) and therefore subject to mandatory detention under  
2 § 1225(b)(2), without regard for the length of time they have lived in the United States.

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

12  
13  
14 32. Almost every Federal District Court that has considered the issue has  
15 found that DHS’s interpretation defies the INA. In Arizona, the following decisions so  
16 find and collect the cases from other district courts around the country:

- 17  
18 a. 12/12/2025 Order granting habeas in *Gonzalez-Gonzalez v. Noem*, et al.,  
19 Case No. 25-cv-04478-DWL (D. Ariz 12-12-25)(The court declined to  
20 revisit the conclusion it reached in *Echevarria*).
- 21 b. 11/26/2025 Order granting habeas in *Luna-Gonzalez v. Noem*, et al., Case  
22 No. 25-cv-03794-PHX (D. Ariz 11-26-25)(The court rejected the  
23 government’s argument that the petitioner is an “arriving alien” subject to  
24 mandatory detention under § 1225 and agrees instead with the growing  
25 majority of courts that people like the petitioner—who were arrested  
26 inside the United States long after entering—are detained under § 1226(a),  
27 not § 1225.), gathering cases, filed with the Habeas Petition as Exhibit 7;
- 28 c. 11/24/25 Order granting habeas in *Padron-Carreron v. Noem*, et al., Case  
No. 25-cv-04204-PHX (D. Ariz. 11-25-25)(“Respondents correctly  
acknowledge that their view still represents the minority position—in the

1 weeks since the Court considered the issue in Echevarria, dozens of other  
2 courts have reached the same conclusion... [that] § 1226(a)'s application  
3 for the past three decades supports its application to noncitizens in  
4 petitioner's position"), gathering cases, filed with the Habeas Petition as  
5 Exhibit 8;

6 d. 11/18/2025 Order granting habeas in *Rodrigues da Silva v. Figueroa, et*  
7 *al.*, Case No. 25-cv-04015-PHX (D. Ariz. 11-18-25)("dozens of other  
8 district courts have concluded individuals like Petitioner are subject to §  
9 1226 and not § 1225 and, therefore, are not subject to mandatory  
10 detention"), gathering cases, filed with the Habeas Petition as Exhibit 9;

11 e. 11/13/2025 Order granting habeas in *Perez Rodriguez v. Noem, et al.*, Case  
12 No. 25-cv-03921-PHX (D. Ariz. 11/13/2025)("the vast majority of courts  
13 concluded individuals like Petitioner are subject to § 1226 and not § 1225  
14 and, therefore, are not subject to mandatory detention"), gathering cases,  
15 filed with the Habeas Petition as Exhibit 10

16 f. 11/6/25 Order granting habeas in *Gonzalez Rodriguez v. Bondi, et al.*, Case  
17 No. 25-cv-03917-PHX (D. Ariz. 11-6-25)("dozens of other district courts  
18 have concluded individuals like Petitioner are subject to § 1226 and not §  
19 1225 and, therefore, are not subject to mandatory detention"), gathering  
20 cases, filed with the Habeas Petition as Exhibit 11

21 g. 11/6/2025 Order Granting Habeas in *Abrego-Zarate v. Noem, et al.*, Case  
22 No. 25-cv-03564-KML (D. Ariz. 11-6-25)("the great weigh of authority  
23 is that individuals like petitioner are not subject to mandatory detention.  
24 This court agrees with the majority view. For these reasons, the petition is  
25 granted, and petitioner must receive a bond hearing without application of  
26 *Matter of Yajure Hurtado*, 29 I&N 216 (B.I.A. 2025."), filed herewith as  
27 Exhibit 12.

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

- 1
- 2 i. 10/22/2025 Order granting habeas in *Garcia-Rosales v. Noem, et al.*, No. 2:25-cv-03391-SHD-DMF at page 2 (D. Ariz. Oct. 22, 2025)(“while
- 3 Respondents point to two district court opinions adopting their
- 4 interpretation of § 1225(b)(2)(A), myriad other district courts have
- 5 reached the same conclusion as *Echevarria* and held individuals like
- 6 Petitioner are not subject to mandatory detention under 1225(b)(2)(A)”),
- 7 filed herewith as Exhibit 14.
- 8 j. 10/17/2025 Order granting habeas corpus in *Benitez-Cornejo v. Cantu, et*
- 9 *al.*, No. 2:25-cv-03672 (D. Arizona Oct. 17, 2025)(“individuals like
- 10 Petitioner are not “arriving aliens” subject to mandatory detention but,
- 11 rather, are subject to the general removal statute, 8 U.S.C. § 1226(a)”),
- 12 filed herewith as Exhibit 15.
- 13 k. 10/09/2025 Order granting habeas entered in *Hector Lopez-Melo v. Bondi,*
- 14 *et. al.*, Case No. Case 2:25-cv-03394-DJH--JZB (D. Ariz.
- 15 10/9/2025)(“petitioner, who had been present in the United States for
- 16 years, was not an applicant for admission under 1225(b)(2)(A) or subject
- 17 to mandatory detention”), filed herewith as Exhibit 16.
- 18 l. 10/07/2025 Order granting habeas corpus in *Bo Li v. Cantu, et al.*, No.
- 19 CV-25-02989-PHX-SPL (D Arizona 10/07/2025)(“Respondents maintain
- 20 he is subject to mandatory detention under 1225(b)(2). Again,
- 21 Respondents are mistaken.”), filed herewith as Exhibit 17.
- 22 m. 10/3/2025 Order granting habeas corpus in *Echevarria v. Bondi, et al.*, No.
- 23 2:25-cv-03252-PHX-DWL, 2025 WL 2821282 (D. Ariz. Oct. 3,
- 24 2025)(“Court agrees with the majority of courts that have concluded that
- 25 § 1226(a), rather than § 1225(b)(2)(A), applies in this circumstance.”),
- 26 filed herewith as Exhibit 18.
- 27 n. 08/11/2025 Magistrate’s Report and Recommendation in *Rocha Rosado*
- 28 *v. Figueroa*, No. CV-25-02157-PHX-DLR 2025 WL 2349133 at \*10 (D.
- Ariz. Aug. 13, 2025)(Magistrate’s Report and Recommendation Adopted
- at 2025 WL 2349133)([t]he text of § 1226, the canons of statutory
- interpretation, this section's legislative history, and longstanding agency

1 practice indicate that Rosado is subject to § 1226(a)'s 'default' rule for  
2 discretionary detention rather than § 1225's mandatory detention  
3 requirement, and that the IJ erred by finding they did not have jurisdiction  
4 to consider Rosado's detention.") *report and recommendation adopted sub*  
5 *nom.* 2025 WL 2349133 (D. Ariz. Aug. 13, 2025), filed herewith as  
6 Exhibit 19.

7 33. Petitioner has located only 6 cases holding to the contrary. In *Vargas*  
8 *Lopez v. Trump*, --F. Supp. 3d--, 2025 WL 2780351 (D. Neb. Sept. 30, 2025), the court  
9 held that Vargas Lopez failed to meet his burden to show that he falls under § 1226(a),  
10 so "his Petition fails regardless of the parties' arguments about the scope of § 1225(b)  
11 and § 1226(a)." *Vargas Lopez v. Trump*, 2025 WL 2780351 at \*7 (emphasis added). In  
12 *Chavez v. Noem*, -- F. Supp. 3d --, 2025 WL 2730228 (S.D. Cal. Sept. 24, 2025), the  
13 court denied a temporary restraining order on the grounds that the petitioners had "not  
14 demonstrated serious questions about the application of Section 1225 to aliens present  
15 in the United States." *Chavez v. Noem*, 2025 WL 2730228 at \*4. However, the court  
16 spent less than 2 pages analyzing the statutory language and caselaw before concluding  
17 that "Petitioners have not shown either a likelihood of success or serious questions going  
18 to the merits [therefore] we do not address the remaining Winter factors." *Chavez v.*  
19 *Noem*, 2025 WL 2730228 at \*5. *Mejia Olalde v. Noem*, 2025 U.S. Dist. LEXIS 221830  
20 (E.D. Mo. Nov. 10, 2025) was concerned with whether the habeas petition had been  
21 properly filed in that court's jurisdiction and never reached the application of § 1225(b)  
22 to the petitioner. *Pipa-Aquise v. Bondi*, No. 25-1094, 2025 WL 2490657 (E.D. Va. Aug.  
23 5, 2025) and *Pena v. Hyde*, No. 25-11983, 2025 WL 2108913 (D. Mass. July 28, 2025)  
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1 were each shorter than two pages long and neither contained any significant analysis.  
2 Lastly, in *Lauren-Ayala v. Noem*, No. 25-cv- 04425-KML--JFM (D. Ariz. 12/12/2025).  
3 the court did not reach the merits of the habeas claim or analyze the governing statute;  
4 instead, it dismissed the petition for lack of jurisdiction, concluding that, because  
5 petitioner failed to address the immigration court’s alternative dangerousness finding, it  
6 could not order any effective relief. Thus, none of these cases are particularly instructive.  
7

8  
9 34. In 1997, after Congress amended the INA through the Illegal  
10 Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA), EOIR and  
11 the then-Immigration and Naturalization Service issued an interim rule to interpret and  
12 apply IIRIRA. Specifically, under the heading of “Apprehension, Custody, and  
13 Detention of Aliens,” the agencies explained that:  
14

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

19 62 Fed. Reg. at 10323 (emphasis added). The agencies thus made clear that  
20 individuals who had entered without inspection ***were*** eligible for consideration for  
21 bond and bond hearings before IJs under 8 U.S.C. § 1226 and its implementing  
22 regulations.  
23

24 35. Thus, for almost 30 years, all participants in the immigration system  
25 have understood that people arrested inside the United States generally fall within §  
26 1226 for detention purposes and are therefore required to receive a bond hearing upon  
27 request—even if they initially entered the country without permission. *See Martinez v.*  
28

1 *Hyde*, No. 25-11613, 2025 WL 2084238, at \*4 n.9 (D. Mass. July 24, 2025) (citing the  
2 United States Solicitor General’s representation to the Supreme Court at oral argument  
3 that “DHS’s long-standing interpretation has been that 1226(a) applies to those who  
4 have crossed the border between ports of entry and are shortly thereafter apprehended”).

5  
6 36. Despite the overwhelming number of federal cases that have ruled  
7 against the government’s position, DHS and DOJ are continuing to systemically  
8 misclassify people and unlawfully deny them access to bond hearings and release on  
9 bond during the pendency of their immigration proceedings.  
10

11 **CLAIMS FOR RELIEF**  
12 **FIRST CLAIM FOR RELIEF**  
13 **Violation of Fifth Amendment – Substantive Due Process**

14  
15 37. Petitioner realleges and incorporates herein the allegations contained  
16 in the preceding paragraphs of the petition as if fully set forth herein.

17 38. The Due Process Clause of the Fifth Amendment forbids the  
18 government from depriving any “person” of liberty “without due process of law,”  
19 including noncitizens. U.S. Const. amend. V.  
20

21 39. Substantive due process asks whether a person’s life, liberty, or  
22 property is deprived without sufficient purpose. There is no question that Petitioner has  
23 been deprived of his liberty in this case.  
24

25 40. The government’s continued detention of Petitioner is not supported  
26 by any special interest or compelling justification that outweighs his liberty interest.  
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1           41.       Petitioner's ongoing detention when so many federal courts have held  
2 that he is entitled to be considered for release upon posting an appropriate bond under §  
3 1226 constitutes prolonged detention and violates his substantive due process rights.  
4

5                                   **SECOND CLAIM FOR RELIEF**  
6                                   **Violation of Fifth Amendment Right - Procedural Due Process**

7           42.       Petitioner realleges and incorporates herein the allegations contained  
8 in the preceding paragraphs of the petition as if fully set forth herein.  
9

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

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

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

22                                   **PRAYER FOR RELIEF**

23                   **WHEREFORE** Petitioner Dumitru Nicolae respectfully requests that the  
24 Court grant the following relief:

- 25           1.     Assume jurisdiction over this matter;  
26           2.     Order Respondents not to transfer Petitioner out of this District during the  
27 pendency of these proceedings, to preserve jurisdiction;  
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3. Issue a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 and order Respondents to immediately release Petitioner from custody or, in the alternative, order Respondents to provide Petitioner a bond hearing under 8 U.S.C. § 1226, and without regard to the holding of *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (B.I.A. 2025), within three (3) business days;
4. Award Petitioner reasonable attorneys' fees and costs pursuant to the Equal Access to Justice Act, 28 U.S.C. § 2412; and
5. Grant any further relief the Court deems just and proper.

/  
/  
Dated this 29<sup>th</sup> day of December,  
2025.

By: /s/ Erica Sanchez  
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**VERIFICATION PURSUANT TO 28 U.S.C. § 2242**

I represent Petitioner Dumitru Nicolae 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 29<sup>th</sup> 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	Declaration of Counsel in Support of Petition for Writ of Habeas Corpus
Exhibit 5	Notice to Appear
Exhibit 6	Cover Page of Petitioner's Application for Asylum and for Withholding of Removal
Exhibit 7	Order granting habeas in <i>Gonzalez-Gonzalez v. Noem</i> , et al., Case No. 25-cv-04478-DWL (D. Ariz. 12-12-25)
Exhibit 8	Order granting habeas in <i>Luna-Gonzalez v. Noem</i> , et al., Case No. 25-cv-03794-PHX (D. Ariz. 11-26-25)
Exhibit 9	Order granting habeas in <i>Padron-Carreron v. Noem</i> , et al., Case No. 25-cv-04204-PHX (D. Ariz. 11-24-25)
Exhibit 10	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 11	Order entered <i>Perez Rodriguez v. Noem</i> , et al., Case No. 25-cv-03921-PHX (D. Ariz. 11/13/2025)
Exhibit 12	Order entered <i>Gonzalez Rodriguez v. Bondi</i> , et al., Case No. 25-cv-03917-PHX (D. Ariz. 11-6-25)
Exhibit 13	Order entered in <i>Abrego-Zarate v. Noem</i> , et al., Case No. 25-cv-03564-KML (D. Ariz. 11-6-25)
Exhibit 14	Order entered in <i>Lopez-Cruz v. Noem</i> , et al, No. 2:25-cv-03566-DJH--ASB (D. Ariz. 11/3/2025)
Exhibit 15	Order entered in <i>Garcia-Rosales v. Noem</i> , et al., No. 2:25-cv-03391-SHD—DMF (D. Ariz. Oct. 22, 2025)
Exhibit 16	Order granting habeas corpus in <i>Benitez-Cornejo v. Cantu</i> , et al., No. 2:25-cv-03672 (D. Arizona Oct. 17, 2025)
Exhibit 17	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 18	Order granting habeas corpus in <i>Bo Li v. Cantu</i> , et al., No. CV-25-02989-PHX-SPL (D Arizona 10/07/2025)

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Exhibit 19	Order entered in <i>Francisco Echevarria v. Pam Bondi, et al.</i> , CV-25-03252-PHX-DWL (ESW), (D. Ariz. 10/3/2025)
Exhibit 20	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)