

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

RUBEN ENRIQUE RAMIREZ ROMERO,)

Petitioner,)

v.)

WARDEN of Stewart Detention Center;)

KRISTIN SULLIVAN, Acting Director,)

Immigration and Customs Enforcement)

and Removal Operations (“ICE/ERO”))

Field Office, Atlanta;)

KRISTI NOEM, Secretary of the)

Department of Homeland Security (“DHS”);)

and PAMELA BONDI, Attorney General)

of the United States,)

in their official capacities,)

Respondents.)

Case No. 4:26-cv-00018

PETITIONER’S REPLY

I. Introduction

Petitioner Ruben Enrique Ramirez Romero respectfully asserts that he continues to be unlawfully detained at the Stewart Detention Center, located at 146 CCA Road, Lumpkin, GA 31815. Respondent acknowledged that the legal issues in this case concern “similar challenges to the detention authority at issue” in this

Court's recent decisions in *J.A.M. v. Streeval*, No. 4:25-cv-342-CDL, 2025 WL 3050094 (M.D. Ga. Nov. 1, 2025) and *P.R.S. v. Streeval*, No. 4:25-cv-343-CDL, 2025 WL 3269947 (M.D. Ga. Nov. 24, 2025). *See* ECF No. 7 at 1. Accordingly, this Court should grant the instant Petition and order that Respondents hold a bond hearing for Petitioner within three days, or alternatively, release him from custody.

II. This Court should adhere to its reasoning in *J.A.M.* and *P.R.S.*

Respondent asserts that this Court's prior rulings in *J.A.M.* and *P.R.S.* "would control the result in this case should the Court adhere to its legal reasoning in those prior decisions." *See* ECF No. 7 at 1-2.

Petitioner accordingly asserts that this Court should adhere to its legal reasoning in *J.A.M.* and *P.R.S.* in deciding his case, as his factual position is substantially similar. Just like the petitioner in *J.A.M.* and *P.R.S.*, Petitioner here was decidedly not "seeking admission" to the U.S. at the time of his arrest and detention, as he has been living in the interior of the country since 2021. Respondent makes no additional arguments outside of what this Court already rejected in *J.A.M.* and *P.R.S.*

Petitioner is thus, at minimum, entitled to a bond hearing.

CONCLUSION

For all these reasons, this Court should order Petitioner to be released from custody or order a bond hearing to take place within three days.

Respectfully submitted,

/s/ Brittany S. Pierce

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