

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
El Paso Division**

Jorge Luis Rivas (),

Petitioner,

v.

Civil Action No. _____

Kristi Noem, *Secretary of Homeland Security,*

Todd Lyons, *Acting Director, U.S. Immigration
and Customs Enforcement,*

Mary De Anda-Ybarra, *Field Office Director
Dallas Field Office, U.S. Immigration
and Customs Enforcement,*

Pamela Bondi, *Attorney General,*

Warden, *ERO El Paso Camp East Montana*

Respondents.

PETITION FOR WRIT OF HABEAS CORPUS
INTRODUCTION

Petitioner Jorge Luis Rivas () is a citizen of Nicaragua who entered the United States in 2021. He was encountered upon entry and released on his own recognizance under 8 U.S.C. § 1226(a), and has been regularly reporting to U.S. Immigration and Customs Enforcement (“ICE”) ever since. Petitioner was summarily re-arrested by ICE at a standard check-in on or about October 23, 2025. He is currently detained by ICE under facts and circumstances that place him squarely within ICE’s general detention authority 8 U.S.C. § 1226(a). Under that statute, Petitioner is eligible to seek discretionary release on bond from an Immigration Judge (“IJ”). Due to a new policy announced by ICE in July 2025, and now a recent Board of Immigration

Appeals (“BIA”) decision that overturns decades of settled law, Respondents contend that Petitioner is actually detained under 8 U.S.C. § 1225(b). However, while § 1225 requires mandatory detention and does not allow release on bond, it only applies to noncitizens apprehended at the border “seeking admission.” Petitioner therefore brings this action for a declaratory judgment from this Court that he is properly detained (if at all) only pursuant to 8 U.S.C. § 1226(a); and seeking an order that Respondents schedule him for a discretionary bond hearing pursuant to § 1226(a) before an Immigration Judge within 15 days.

JURISDICTION AND VENUE

1. This Court has jurisdiction to hear this case under 28 U.S.C. § 2241 and 28 U.S.C. § 1331, Federal Question Jurisdiction. In addition, the individual Respondents are United States officials. 28 U.S.C. § 1346(a)(2).

2. This Court also has federal question jurisdiction, through the APA, to “hold unlawful and set aside agency action” that is “arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law.” 5 U.S.C. § 706(2)(A). APA review of a final agency action may proceed, absent a special statutory review proceeding, by “any applicable form of legal action, including actions for declaratory judgments or writs of prohibitory or mandatory injunction or habeas corpus, in a court of competent jurisdiction.” 5 U.S.C. § 703.

3. Venue lies in this District because Petitioner is currently detained within the territorial jurisdiction of this division of this District; and each Respondent is an agency or officer of the United States sued in his or her official capacity. 28 U.S.C. § 2241; 28 U.S.C. § 1391(e)(1).

THE PARTIES

4. Petitioner Jorge Luis Rivas is a citizen and native of Nicaragua, who resides in Virginia. He is currently detained by Respondents at the ICE El Paso Camp East Montana in El

Paso, TX, within the territorial jurisdiction of this Court.

5. Respondent Kristi Noem is the Secretary of the Department of Homeland Security (“DHS”). She is the cabinet-level secretary responsible for all immigration enforcement in the United States.

6. Respondent Todd Lyons is the Acting Director of U.S. Immigration and Customs Enforcement (“ICE”). He is the head of the federal agency responsible for all immigration enforcement in the United States.

7. Respondent Mary De Anda-Ybarra is the Acting Field Office Director of the Dallas ICE Field Office in Dallas, TX. He is responsible for overseeing ICE operations pertaining to noncitizens within the office’s territorial jurisdiction, such as Petitioner, including detentions, enforcement, and removal operations. He is the immediate legal custodian of Petitioner.

8. Respondent Pamela Bondi is the Attorney General of the United States. The Immigration Judges who decide removal cases and applications for bond and relief from removal do so as her designees.

9. All government Respondents are sued in their official capacities.

LEGAL BACKGROUND

A. Immigration Detention Legal Framework

10. When a noncitizen is alleged to have violated immigration laws, they are generally placed into traditional removal proceedings, during which an immigration judge will determine whether they are removable and then whether they have a legal basis to remain in the United States. 8 U.S.C. § 1229a.

11. Detention is authorized for “certain aliens already in the country pending the outcome of removal proceedings under § 1226(a) and 1126(c).” *See Jennings v. Rodriguez*, 583

U.S. 281, 289 (2018). The statute provides that an individual may be subject to either discretionary detention under 8 U.S.C. § 1226(a) generally, or mandatory detention under 8 U.S.C. § 1226(c) if they have been arrested or convicted of certain crimes. Discretionary detention under § 1226(a) has been described as the “default” provision for immigration detention for those subject to traditional removal proceedings. *Id.* at 288. Under § 1226(a), “[e]xcept as provided in subsection (c) of this section,’ the Attorney General ‘may release’ an alien detained under § 1226(a) ‘on ...bond’ or ‘conditional parole.’” *Id.*

12. Alternatively, mandatory detention is authorized for “certain aliens *seeking admission* into the country under §§ 1225(b)(1) and 1225(b)(2),” [emphasis added]. *Jennings*, 583 U.S. at 289. Individuals inspected under § 1225(b) and determined to be “applicants for admission” may be subject to mandatory detention under two separate subsections. Applicants for admission include someone:

“present in the United States who has not been admitted or who arrives in the United States (whether or not at a designated port of arrival and including an alien who is brought to the United States after having been interdicted in international or United States waters) shall be deemed for the purposes of this chapter to be an applicant for admission.”

§ 1225(a)(1).

13. The first subset, under 8 U.S.C. § 1225(b)(1), may be subject to expedited removal and mandatory detention if they are determined to be an “arriving alien,” and if they have not been physically present in the United States continuously for a two-year period immediately prior. Regulations define an “arriving alien” as:

“an applicant for admission coming or attempting to come into the United States at a port-of-entry, or an alien seeking transit through the United States at a port-of-entry, or an alien interdicted in international or United States waters and brought into the United States by any means, whether or not to a designated port-of-entry, and regardless of the means of transport.”

8 C.F.R. § 1.2.

14. Otherwise, 8 U.S.C. § 1225(b)(2) provides for the detention of “applicant for admission” specifically when “the examining immigration officer determines that an alien *seeking admission* is not clearly and beyond a doubt entitled to be admitted, the alien shall be detained for a proceeding under section 1229a of this title,” i.e. for traditional removal proceedings [emphasis added].

15. An “arriving alien” or an applicant for admission “seeking admission” may only be released from detention on parole (which is a form of release on recognizance), under 8 U.S.C. § 1182(d)(5). *Jennings*, 583 U.S. at 288. There is no bond available to an arriving alien or applicant for admission seeking admission. *Id.* There is no such thing as a “parole bond” – a release must be either parole under § 1182(d)(5) or a bond (conditional parole) under § 1226(a). *Id.*

16. For a noncitizen subject to discretionary detention under 8 U.S.C. § 1226(a), ICE makes an initial custody determination to either set a bond or hold the individual at no bond. The noncitizen may then seek a review of ICE’s initial custody determination before the IJ (a “custody review hearing”), who has the authority to modify ICE’s custody determination and set bond in a case in which ICE has designated no bond, lower bond when ICE has set a cash bond amount, or deny bond completely. 8 C.F.R. § 1003.19.

17. Custody review hearings are separate from hearings in the underlying removal proceedings. 8 C.F.R. § 1003.19(d). If a noncitizen is granted bond by the IJ, she must still appear in immigration court for the IJ to determine her removability and hear any claim for relief from removal. At a custody review hearing, once jurisdiction over bond is established, the IJ’s inquiry is limited to whether the detainee is a danger to the community or a flight risk, and bond may only

be granted when an IJ has determined that the detainee meets his burden of proof that he is neither. *Matter of Guerra*, 24 I&N Dec. 37 (BIA 2006).

18. For decades, it has been Respondents' practice to afford § 1226(a) discretionary bond hearings and custody review hearings to those individuals who have been encountered neither at a point of entry nor seeking admission to the United States. *See Rosado v. Figueroa*, No. CV 25-02157 PHX DLR (CDB), 2025 WL 2337099, at *10 (D. Ariz. Aug. 11, 2025), *report and recommendation adopted sub nom. Rocha Rosado v. Figueroa*, No. CV-25-02157-PHX-DLR (CDB), 2025 WL 2349133 (D. Ariz. Aug. 13, 2025) ("Respondents' proposed application of § 1226 is also belied by the Department of Homeland Security's 'longstanding practice' of treating noncitizens taken into custody while living in the United States, including those detained and found inadmissible upon inspection and then released into the United States with the government's acquiescence, who have committed no crime after release, as detained under § 1226(a)." citing *Loper Bright Enter. v. Raimondo*, 603 U.S. 369, 386 (2024)).

B. New ICE memo reinterpreting 8 U.S.C. § 1225(b)(2)

19. On July 8, 2025, Respondent ICE issued new interim guidance that announced a breathtakingly broad interpretation of 8 U.S.C. § 1225(b)(2). *See* ICE memorandum "Interim Guidance Regarding Detention Authority for Applications for Admission."¹ This memo concerns the detention of "applicants for admission" as defined by § 1225(a)(1). "Effective immediately, it is the position of DHS that such aliens are subject to detention under [8 U.S.C. § 1225(b)(2)] and may not be released from ICE custody except by [8 U.S.C. § 1182(d)(5)]." *Id.* DHS is explicit that this new policy is a marked deviation from prior interpretation and treatment of affected

¹ Available at <https://www.aila.org/library/ice-memo-interim-guidance-regarding-detention-authority-for-applications-for-admission> (last visited Sept. 25, 2025).

noncitizens. *Id.* (“For custody purposes, these aliens are now treated in the same manner that “arriving aliens” have historically been treated.”)

20. In addition to the announcement re-interpreting § 1225(b)(2), the memo further clarifies that “[t]he only aliens eligible for a custody determination and release on recognizance, bond or other conditions under [8 U.S.C. § 1226(a)] during removal proceedings are aliens admitted to the United States and chargeable with deportability under [8 U.S.C. § 1227], with the exception of those subject to mandatory detention under [8 U.S.C. § 1226(c)].” *Id.*

21. Moreover, ICE maintains that “DHS does not take the position that prior releases of applicants for admission pursuant to INA § 236(a) were releases on parole under INA § 212(d)(5) based on this change in legal position.” *Id.* ICE fails to clarify under what legal authority, then, those prior releases were effectuated. Rather, ICE signals the resulting lack of “correct” paperwork is nonetheless permissible. *Id.* (“Accordingly, ERO and HIS are not required to ‘correct’ the release paperwork by issuing INA § 212(d)(5) parole paperwork.”)

22. Nationwide implementation of the ICE § 1225(b)(2) mass detention policy ensued.

C. Recent BIA decision *Matter of Yajure Hurtado*

23. On September 5, 2025, the Board of Immigration Appeals (BIA), which oversees all appeals of IJ decisions including custody redeterminations, upheld ICE’s re-interpretation of § 1225(b)(2). *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025).

24. The BIA held that the respondent was an “applicant for admission” within the scope of § 1225(b), and therefore subject to mandatory detention.

25. The BIA characterized the issue before it as “one of statutory construction: Does the INA require that *all* applicants for admission, even those like the respondent who have entered without admission or inspection and have been residing in the United States for years without

lawful status, be subject to mandatory detention for the duration of their immigration proceedings, and thus the Immigration Judge lacks authority over a bond request filed by an alien in this category?” [emphasis added]. *Id.* at 220.

26. The BIA reasoned that individuals “who surreptitiously cross into the United States remain applicants for admission until and unless they are lawfully inspected and admitted by an immigration officer.” *Id.* at 228.

27. The BIA acknowledged the decades of precedent preceding its decision that authorized release of individuals present without having been inspected and admitted or paroled under § 1226(a). *Id.* at 225, FN6 (“We acknowledge that for years Immigration Judges have conducted bond hearings for aliens who entered the United States without inspection. However, we do not recall either DHS or its predecessor, the Immigration and Naturalization Service, previously raising the current issue that is before us. In fact, the supplemental information for the 1997 Interim Rule titled ‘Inspection and Expedited Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal Proceedings; Asylum Procedures,’ 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997), reflects that the Immigration and Naturalization Service took the position at that time that ‘[d]espite being applicants for admission, aliens who are present without having been admitted or paroled (formerly referred to as aliens who entered without inspection) will be eligible for bond and bond redetermination.’”)

28. Ultimately, the BIA upheld the decision that the IJ lacked jurisdiction under 8 U.S.C. § 1225(b)(2) to consider the respondent for discretionary bond. *Id.* at 229. The BIA decision is binding on all immigration judges nationwide.

29. Respondents’ new policy and interpretation of 8 U.S.C. § 1225(b)(2) stand to sweep millions of noncitizens into mandatory detention, without any consideration for release on bond

(regardless of their ties to their community or lack of dangerousness or flight risk). *Rosado*, 2025 WL 2337099, at *11 (“It has been estimated that this novel interpretation would require the detention of millions of immigrants currently residing in the United States.”)

D. Class Action in *Maldonado Bautista*

30. In the U.S. District Court for the Central District of California, a class brought suit against the July 2025 policy to apply § 1225(b)(2) to individuals who previously entered the U.S. without inspection. *Maldonado Bautista v. Santacruz*, --- F.Supp.3d ----, 2025 WL 3289861 (C.D. Cal. Nov. 20 2025). On November 20, 2025, summary judgment was partially granted in favor of the putative class in *Maldonado Bautista*, holding that ICE’s July 2025 policy was unlawful. *Id.* at *10 (“Thus, Respondents’ expansive interpretation of ‘applicants for admission’ would effectively nullify a portion of the INA through the DHS’s legislative or interpretive exercise of power. Neither is appropriate under the separation of powers.”). The court held that § 1226(a) applies to the putative class. *Id.* at 11. The court declined to issue a final judgment under Fed. R. Civ. Pro. 54(b), as the motion for class certification was still pending. *Id.* On November 25, 2025, the court certified “Bond Eligible Class” of:

“All noncitizens in the United States without lawful status who (1) have entered or will enter the United States without inspection; (2) were not or will not be apprehended upon arrival; and (3) are not or will not be subject to detention under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231 at the time the Department of Homeland Security makes an initial custody determination.”

Bautista v. Santacruz, No. 5:25-CV-01873-SSS-BFM, 2025 WL 3288403, at *9 (C.D. Cal. Nov. 25, 2025). The *Maldonado Bautista* court then set a status conference for early 2026. *Id.*

31. Since the decisions in *Maldonado Bautista*, immigration judges nationwide have continued to bar access to bond hearings citing § 1225(b)(2), stating that *Maldonado Bautista v. Santacruz*, --- F.Supp.3d ----, 2025 WL 3289861 (C.D. Cal. Nov. 20 2025), is not a final judgment and therefore does not bind them to its holding. Accordingly, immigration judges have continued to follow *Yajure Hurtado*, 29 I&N Dec.216 (BIA 2025). *See e.g.*

☒ **Other:**

The Court has not been shown to have jurisdiction to set bond with respect to this Respondent. The court in *Bautista v. Noem*, 5:25-cv-01873-SSS-BFM (C.D. Cal.), granted class certification and partial summary judgment for the plaintiffs in that case, but did not issue a class-wide declaratory judgment. The court also did not issue a class-wide injunction, which would not be permitted by law. Until and unless the *Bautista* court issues a class-wide declaratory judgment or injunction, the *Bautista* court's opinion and partial grant of summary judgment does not constitute a judgment. *See, e.g., Fed. R. Civ. P. 54(b)*

32. On December 18, 2025, the court granted the motion to reconsider, in light of the fact that immigration judges nationwide were refusing to follow the court's prior summary judgment decision, and granted a final judgment. *Maldonado Bautista*, No. 5:25-cv-01873-SSS-BFM, 2025 WL 3678485 (C.D. Cal. Dec. 18, 2025). "A notice of appeal was then filed by the *Bautista* defendants on December 18, 2025, ECF No. 95." *Engonga v. Noem*, No. 5:25-CV-03479-FWS-MAA, 2025 WL 3764077, at *3 (C.D. Cal. Dec. 23, 2025). "However, the Ninth Circuit has held the filing of an appeal does not suspend the preclusive effect of a lower court judgment." *Osuna v. Casey*, No. 25CV3668-LL-MMP, 2026 WL 50755, at *1 (S.D. Cal. Jan. 7, 2026) citing *Hawkins v. Risley*, 984 F.2d 321, 324 (9th Cir. 1993).

FACTS

33. Petitioner Jorge Luis Rivas is a citizen of Nicaragua who is currently detained by U.S. Immigration and Customs Enforcement ("ICE") at ERO El Paso – Camp East Montana,

located in El Paso, Texas. Petitioner entered the United States in December 2021, during which time he was encountered by immigration officials. He was detained and placed in removal proceedings. *See* Ex. 1. ICE Form I-862 Notice to Appear. Petitioner was ultimately released on his own recognizance. *See* Ex. 2. ICE Form I-220A Order of Release on Recognizance.

34. After arriving in the United States, Mr. Rivas eventually settled in Virginia, where he established his home and community ties.

35. Petitioner applied for asylum as relief from removal. He was issued work authorization on that basis. *See* Ex. 3. USCIS employment authorization card.

36. Prior to his detention, Mr. Rivas consistently complied with all requirements imposed by ICE. He timely reported through the Smart Link (ISAP) application and appeared as instructed for ICE check-ins. On October 23, 2025, Mr. Rivas appeared at the Baltimore Field Office for an appointment scheduled by ICE as part of its supervision through Smart Link. At that appointment, ICE officers alleged that he had missed a check-in through the application and, on that basis alone, placed him into custody. Mr. Rivas disputes this allegation and had otherwise remained fully compliant with ICE supervision.

37. Following his arrest, Mr. Rivas was transferred from Maryland to Texas, where he remains detained. Upon information and belief, Petitioner is currently detained at the El Paso Camp East Montana located in El Paso, TX (*available at: <https://locator.ice.gov/odls/#/details>* (last visited on January 7, 2026)).

← → ↻ 📄 locator.ice.gov/odls/#/results

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and Customs
Enforcement**Report Crimes:

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Search Results: 1

JORGE LUIS RIVAS
Country of Birth : Nicaragua
A-Number: 
Status : In ICE Custody
State: TX
Current Detention Facility: ERO EL PASO CAMP EAST MONTANA
** Click on the Detention Facility name to obtain facility contact information*

BACK TO SEARCH >

38. Petitioner's removal proceedings remain pending, his Individual Hearing is scheduled for March 31, 2026, and there is no final order of removal in his case. *See* EOIR Automated Case Information system, (*available at: <https://acis.eoir.justice.gov/en/>* (last visited on January 7, 2026)):

- → ↺ ⚙️ acis.eoir.justice.gov/en/caseInformation 🔍 📄 ☆ 📁 📧

An official website of the United States government [Here's how you know](#)

EOIR | Automated Case Information

Court Closures Today January 9, 2026 | Please check <https://www.justice.gov/eoir-operational-status> for up to date closures.

Home > RIVAS, JORGE LUIS

Automated Case Information

Name: RIVAS, JORGE LUIS | A-Number: [REDACTED] | Docket Date: 8/22/2024

Next Hearing Information

Your upcoming INDIVIDUAL hearing is on **March 31, 2026 at 1:00 PM.**

JUDGE
Miles, Jessica K.

COURT ADDRESS
8915 MONTANA AVENUE
EL PASO, TX 79925

Court Decision and Motion Information


This case is pending.

BIA Case Information

No appeal was received for this case.

Court Contact Information

If you require further information regarding your case, or wish to file additional documents, please contact the immigration court.

COURT ADDRESS
8915 MONTANA AVENUE
EL PASO, TX 79925

PHONE NUMBER
(915) 540-7854

39. Prior to his detention, he resided in Virginia with his partner, a lawful permanent resident of the United States. Mr. Rivas and his partner shared a household and mutually relied on one another for financial and emotional support. Mr. Rivas's detention has disrupted this stable living arrangement and imposed significant hardship on his household in Virginia, as his partner has been left to shoulder housing expenses and other financial obligations alone while also attempting to cover legal fees associated with Mr. Rivas's detention and immigration case.

40. Since his detention, Mr. Rivas has suffered significant mental and physical deterioration. He has experienced severe anxiety due to the loss of liberty and uncertainty of his case and has fallen ill twice while in ICE custody. During the most serious episode, he tested positive for influenza, experienced difficulty breathing and high fever, and was placed in isolation for several days without access to basic hygiene, including bathing, for up to four days, at a time when his condition was critical. His continued detention has also caused substantial hardship to his family and household. His mother and extended family abroad are suffering greatly as a result of his detention. Prior to his detention, Mr. Rivas lived with and mutually supported his partner, and his absence has resulted in significant financial and emotional hardship, including the need for increased work hours to meet basic living expenses and legal costs.

41. All Respondents consider that Petitioner is detained pursuant to 8 U.S.C. § 1225(b)(2). *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216. Accordingly, it would be futile for Petitioner to request a bond from an Immigration Judge. Exhaustion of administrative remedies would therefore be futile.

FIRST CLAIM FOR RELIEF:
No-Bond Detention in Violation of 8 U.S.C. § 1226(a)

42. Petitioner re-alleges and incorporates by reference the preceding paragraphs 1-41.

43. Since Petitioner is not an applicant for admission “seeking admission” or “an arriving alien” subject to 8 U.S.C. §§ 1225(b)(1) or (b)(2) and has no disqualifying criminal arrests or convictions subject to 8 U.S.C. § 1226(c), he is entitled to a bond redetermination hearing by an immigration judge pursuant to 8 U.S.C. § 1226(a).

44. Respondents’ actions, as set forth herein, violate Petitioner’s statutory right to a bond redetermination hearing in front of an immigration judge.

**SECOND CLAIM FOR RELIEF:
Detention in Violation of Due Process**

45. Petitioner re-alleges and incorporates by reference the preceding paragraphs 1-41.

46. Immigration detention is civil, not criminal, in nature. There are only two permissible reasons for immigration detention: to avoid flight risk, and to avoid danger to the community.

47. After entering the United States unlawfully as a child, Petitioner went on to develop ties to the community over the course of over 25 years. Petitioner is therefore a “person” within the meaning of the Due Process Clause of the Fifth Amendment to the U.S. Constitution, and he has a liberty interest in freedom from physical restraint.

48. Respondents’ actions in detaining Petitioner without a bond hearing before a neutral and detached magistrate deprives him of his rights without due process of law.

REQUEST FOR RELIEF

Petitioner prays for judgment against Respondents and respectfully requests that the Court enters an order:

- a) Issuing an Order to Show Cause, ordering Respondents to justify the basis of Petitioner’s detention in fact and in law, forthwith;
- b) Enjoin Petitioner’s transfer outside of this judicial district pending this litigation;
- c) Enjoin Respondents from holding Petitioner subject to detention under 8 U.S.C. § 1225(b)(2) and denying him a bond hearing on that basis;
- d) Enjoin Respondents from re-arresting Petitioner subject to § 1225(b)(2);
- e) Order Petitioner’s immediate release from custody;
- f) Order, in the alternative, Petitioner’s immediate release and that Respondents conduct a bond hearing for Petitioner pursuant to 8 U.S.C. § 1226(a) within 15 days;

- g) Grant the writ of habeas corpus and order Respondents to release Petitioner forthwith, upon payment of the bond as ordered by the Immigration Judge;
- h) Award Petitioner his costs of suit; and
- i) Grant any other relief that this Court deems just and proper.

Respectfully submitted,

Date: January 9, 2025

s/ Simon Sandoval-Moshenberg
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Counsel for Petitioner

LIST OF EXHIBITS

- Ex. 1) ICE Form I-862 Notice to Appear.
- Ex. 2) ICE Form I-220A Order of Release on Recognizance.
- Ex. 3) USCIS employment authorization card.

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on this date, I uploaded the foregoing, with all attachments thereto, to this court's CM/ECF system, which will send a Notice of Electronic Filing (NEF) to all case participants. I furthermore will send a copy by certified U.S. mail, return receipt requested, to:

Civil Process Clerk
United States Attorney's Office
700 E. San Antonio,
Suite 200
El Paso, Texas 79901

Office of the General Counsel
U.S. Department of Homeland Security
245 Murray Lane, SW, Mail Stop 0485
Washington, DC 20528-0485

Pamela Bondi, Attorney General of the
United States
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Office of the Principal Legal Advisor
U.S. Immigration and Customs
Enforcement
500 12th Street SW, Mail Stop 5902
Washington, DC 20536-5902

Respectfully submitted,

Date: January 9, 2025

s/ Simon Sandoval-Moshenberg
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