

1 **Katie Hurrelbrink**
2 Federal Defenders of San Diego, Inc.
3 225 Broadway, Suite 900
4 San Diego, California 92101-5030
5 Telephone: (619) 234-8467
6 Facsimile: (619) 687-2666
7 katie_hurrelbrink@fd.org
8 Attorneys for Mr. Reinoso Martinez

9
10 **UNITED STATES DISTRICT COURT**
11 **SOUTHERN DISTRICT OF CALIFORNIA**

12 SANDY REINOSO MARTINEZ,
13
14 Petitioner,

CIVIL CASE NO.: 26-cv-138-DMS

15 v.

**Traverse in Support of
Petition for a Writ
of Habeas Corpus**

16 KRISTI NOEM, Secretary of the
17 Department of Homeland Security,
18 PAMELA JO BONDI, Attorney General,
19 TODD M. LYONS, Acting Director,
20 Immigration and Customs Enforcement,
21 JESUS ROCHA, Acting Field Office
22 Director, San Diego Field Office,
23 CHRISTOPHER LAROSE, Warden at
24 Otay Mesa Detention Center

25 Respondents.

26 This Court should grant Mr. Reinoso-Martinez’s petition on all three
27 grounds. The government concedes that it has no documentary evidence of an
28 informal interview, and the notice it provides is far too vague to comply with the
regulation and due process. That alone justifies release. Additionally, the
government concedes that Mr. Reinoso-Martinez cannot be removed to Cuba and
ICE has not identified any third country to which can be removed, meaning that
the government cannot meet its burden under *Zadvydas*. Finally, if—despite all
evidence to the contrary—ICE is able to remove Mr. Reinoso-Martinez to a third
country, ICE must at a minimum give him the process set forth in *D.V.D. v. U.S.*

1 *Dep't of Homeland Sec.*, No. CV 25-10676-BEM, 2025 WL 1453640, at *1 (D.
2 Mass. May 21, 2025). Twenty-four hours' notice is not near enough to satisfy the
3 Constitution. This Court should therefore grant this petition on all three counts.

4 **I. Count 1: ICE failed to comply with its own regulations before re-**
5 **detaining Mr. Reinoso Martinez, violating his rights under applicable**
6 **regulations and the Fifth Amendment.**

7 Mr. Reinoso-Martinez raised several regulatory claims in his initial
8 petition. Given the evidence in the government's Return, this Court should find
9 three regulatory violations.

10 *First*, Mr. Reinoso Martinez did not receive an informal interview. DO
11 McLaughlin asserts that “[o]n October 30, 2025, ICE redetained [Mr. Reinoso-
12 Martinez] and provided . . . an informal interview.” Doc. 4-3 at ¶ 8. But he admits
13 that Mr. Reinoso-Martinez’s “file does not contain documentation an informal
14 interview.” *Id.* He does not say why, despite a lack of documentation, he believes
15 that this interview took place. He does not claim to have conducted the interview
16 himself. He does not claim to have spoken to anyone who conducted the interview
17 or identify who that person is. In contrast, Mr. Reinoso-Martinez declared from
18 personal knowledge that no such interview had occurred. Exh. A at ¶ 3.

19 This Court should find that DO McLaughlin’s unsupported assertion is not
20 evidence sufficient to create a disputed issue of fact. The lack of documentation
21 strongly supports that no such interview occurred, as “there typically is such
22 documentation.” *Esmail v. Noem*, No. 2:25-CV-08325-WLH-RAO, 2025 WL
23 3030590, at *3 (C.D. Cal. Sept. 12, 2025). Here, “Respondents have not produced
24 a signed record of that interview, as they [typically do], and Petitioner credibly
25 [declared] that [he] was never provided with an informal interview.” *M.S.L. v.*
26 *Bostock*, No. 6:25-CV-01204-AA, 2025 WL 2430267, at *8 (D. Or. Aug. 21, 2025).
27 Especially where, as here, DO McLaughlin does not claim any personal or even
28 secondhand knowledge of the interview, his “declaration does not provide a

1 sufficiently reliable basis for concluding that the interview was actually
2 conducted.” *Zhang v. Bondi*, No. 25-CV-10418 (JPO), 2026 WL 42778, at *4
3 (S.D.N.Y. Jan. 7, 2026). Other courts have found that “the deviation from
4 Respondents’ usual practice” in not producing an interview form, vagaries in ICE
5 declarations, “and Petitioner’s representation that he did not receive an interview”
6 can support a “find[ing] that Petitioner did not receive an interview in accordance
7 with § 241.4 and § 241.13.” *Touch v. Noem*, No. 3:25-CV-03118-RBM-AHG, 2025
8 WL 3278019, at *5 (S.D. Cal. Nov. 25, 2025), *tentative ruling adopted*, No. 3:25-
9 CV-03118-RBM-AHG, 2025 WL 3296280 (S.D. Cal. Nov. 26, 2025).

10 Alternatively, if this Court does find that the government has submitted
11 enough to create a factual dispute, and the issue proves dispositive, this Court must
12 hold an evidentiary hearing. *Owino v. Napolitano*, 575 F.3d 952, 956 (9th Cir.
13 2009).

14 *Second*, the Notice of Revocation is far too vague to satisfy the due process
15 aims of the regulation. Initially, the notice says that the revocation decision was
16 based “on a review of your file and/or your personal interview on account of the
17 changed circumstances in your case.” Doc. 4-1 at 2. Many courts have found this
18 exact language “insufficient to provide notice,” because it does not say what the
19 supposed changed circumstances are. *Dipraseuth v. Noem*, No. 25-CV-3471 JLS
20 (BJW), 2025 WL 3677674, at *2 (S.D. Cal. Dec. 18, 2025) (collecting cases).

21 The notice then states cryptically that “[d]ue to your recent criminal history
22 and your failure to follow the conditions set forth in your order, a further review of
23 your case is now necessary.” Doc. 4-1 at 2. Notably, the notice does not say that
24 release is *revoked* for that reason. It says his case will be subject to some unspecified
25 “further review.” More importantly, the notice does not identify the “criminal
26 history” or “failure to follow conditions” to which it is referring. Nor is it obvious.
27 Mr. Reinoso-Martinez sustained a conviction 7 years ago in 2018—hardly a
28 “recent” offense—and ICE made an affirmative decision at that time not to take

1 him into custody. Doc. 1-1 at ¶ 2. Is ICE now attempting to reverse that decision
2 years later? Or is ICE referring to some other purported crime or conditions
3 violation? The notice does not say, depriving Mr. Reinoso-Martinez of the
4 opportunity to contest it. That especially matters here, because Mr. Reinoso-
5 Martinez declares that he did not sustain any other convictions or miss any check
6 ins while on release. Doc. 1-1 at ¶ 2.

7 The lack of real notice taints the informal interview that ICE purportedly
8 provided. “[D]ue to the notice’s insufficiency, [Mr. Reinoso-Martinez] [was]
9 not . . . informed of the grounds for his revocation to adequately contest the
10 revocation.” *Van Ngo v. Noem*, No. 25-CV-3234 JLS (MMP), 2025 WL 3470438,
11 at *3 (S.D. Cal. Dec. 3, 2025). “Petitioner must be told *what* circumstances had
12 changed or *why* there was now a significant likelihood of removal in order to
13 meaningfully respond to the reasons and submit evidence in opposition, as allowed
14 under § 241.13(i)(3).” *Sarail A. v. Bondi*, No. 25-CV-2144 (ECT/JFD), 2025 WL
15 2533673, at *10 (D. Minn. Sept. 3, 2025). “Thus, while an informal interview
16 [allegedly] occurred, Petitioner could not have responded to the reasons for
17 revocation, because they were not given.” *Id.*

18 *Third*, there are no changed circumstances justifying re-detention. The
19 government admits that Cuba will not take Mr. Reinoso-Martinez. Doc. 4-3 at ¶ 10.
20 As the petition explained, he does not qualify for removal to Mexico because he
21 has not agreed to go there voluntarily. *See infra*. And the government admits that it
22 has not identified any other third country that will take him. Doc. 4-3 at ¶ 12.

23 Each of these violations require release with no showing of prejudice, as
24 courts in this district have repeatedly found. *See, e.g., Ghafouri v. Noem*, 25-cv-
25 2675-RBM, Dkt. 11 at 9–12 (S.D. Cal. Nov. 4, 2025); 25-cv-2740-BJC, Doc. 13 at
26 8 (S.D. Cal. Nov. 13, 2025); *Soryadvongsa v. Noem*, 25-cv-2663-AGS, Dkt. 11 at
27 4–5 (S.D. Cal. Nov. 8, 2025). “There are two types of regulations: (1) those that
28 protect fundamental due process rights, and (2) and those that do not.” *Martinez v.*

1 *Barr*, 941 F.3d 907, 924 n.11 (9th Cir. 2019) (cleaned up). “A violation of the first
2 type of regulation . . . implicates due process concerns even without a prejudice
3 inquiry.” *Id.* (cleaned up).

4 Here, “[t]here can be little argument that ICE’s requirement that noncitizens
5 be afforded an informal interview—arguably the most bare-bones form of an
6 opportunity to be heard—derives from the fundamental constitutional guarantee of
7 due process.” *Ceesay v. Kurzdorfer*, 781 F. Supp. 3d 137, 165 n.26 (W.D.N.Y.
8 2025). Indeed, “[w]hen the INS published 8 C.F.R. § 241.4 on December 21, 2000,
9 it explained that the regulation was intended to provide aliens procedural due
10 process, stating that § 241.4 ‘has the procedural mechanisms that . . . courts have
11 sustained against due process challenges.’” *Jimenez v. Cronen*, 317 F. Supp. 3d
12 626, 641 (D. Mass. 2018) (quoting *Detention of Aliens Ordered Removed*, 65 FR
13 80281-01). And “[s]ection 241.13(i) includes provisions modeled on § 241.4(*l*) to
14 govern determinations to take an alien back into custody,” *Continued Detention of*
15 *Aliens Subject to Final Orders of Removal*, 66 FR 56967-01, meaning that it
16 addresses the same due process concerns as 241.4(*l*). Thus, these regulations fall
17 squarely into the first category requiring no prejudice showing.

18 If Mr. Reinoso-Martinez did need to show prejudice, however, he could,
19 because he would credibly contest any claim that he has violated conditions in the
20 last 7 years as well as the assertion that changed circumstances make his removal
21 likely. There is therefore a “plausible scenario[] in which the outcome of the
22 proceedings would have been different if a more elaborate process were provided,”
23 *Morales-Izquierdo v. Gonzales*, 486 F.3d 484, 495 (9th Cir. 2007) (cleaned up).

24 **I. Count 2: Mr. Reinoso Martinez’s detention violates *Zadvydas* and 8**
25 **U.S.C. § 1231.**

26 Mr. Reinoso-Martinez must also be released under *Zadvydas v. Davis*, 533
27 U.S. 678, 701 (2001). The government does not contest that the six-month grace
28 period has expired in Mr. Reinoso-Martinez’s case or that Mr. Reinoso-Martinez

1 made an initial showing sufficient to shift the burden. Thus, the only question in
2 this case is whether the government has met its burden to show a “significant
3 likelihood of removal in the reasonably foreseeable future.” *Id.* It has not.

4 DO McLaughlin admits that Cuba will not take Mr. Reinoso-Martinez, Exh.
5 A ¶ 10; that Mr. Reinoso-Martinez is not willing to be voluntarily removed to
6 Mexico, ending ICE’s efforts to send him there, *id.* at ¶ 11; and that ICE has
7 identified no third country that will accept him, *id.* at ¶ 11. ICE’s failure to identify
8 a plausible path to removal is especially damning in light of the undisputed
9 empirical evidence in the petition, which establishes that “alternative-country
10 removal is rare.” *Johnson v. Guzman-Chavez*, 594 U.S. 523, 537 (2021).

11 Furthermore, DO McLaughlin does not provide any evidence about how long
12 a third-country removal might take—no statistics, no anecdotes, no guesses, no
13 nothing. That, too, is fatal. “[D]etention may not be justified on the basis that
14 removal to a particular country is likely *at some point* in the future; *Zadvydas*
15 permits continued detention only insofar as removal is likely in the *reasonably*
16 *foreseeable* future.” *Hassoun*, 2019 WL 78984, at *6. “The government’s active
17 efforts to obtain travel documents from the Embassy are not enough to demonstrate
18 a likelihood of removal in the reasonably foreseeable future where the record before
19 the Court contains no information to suggest a timeline on which such documents
20 will actually be issued.” *Rual v. Barr*, No. 6:20-CV-06215 EAW, 2020 WL
21 3972319, at *4 (W.D.N.Y. July 14, 2020). “[I]f DHS has no idea of when it might
22 reasonably expect [Mr. Reinoso-Martinez] to be repatriated, this Court certainly
23 cannot conclude that his removal is likely to occur—or even that it *might* occur—
24 in the reasonably foreseeable future.” *Singh v. Whitaker*, 362 F. Supp. 3d 93, 102
25 (W.D.N.Y. 2019).

26 ICE’s plan to eventually request a travel document for Mr. Reinoso-Martinez
27 does not move the needle, either, because good faith efforts to secure a travel
28 document do not satisfy *Zadvydas*. The petitioner in *Zadvydas* appealed a “Fifth

1 Circuit h[olding] [that] [the petitioner’s] continued detention [was] lawful as long
2 as good faith efforts to effectuate deportation continue and [the petitioner] failed to
3 show that deportation will prove impossible.” 533 U.S. at 702 (cleaned up). The
4 Supreme Court reversed, finding that the Fifth Circuit’s good-faith-efforts standard
5 “demand[ed] more than our reading of the statute can bear.” *Id.*

6 Thus, “under *Zadvydas*, the reasonableness of Petitioner’s detention does not
7 turn on the degree of the government’s good faith efforts. Indeed, the *Zadvydas*
8 court explicitly rejected such a standard. Rather, the reasonableness of Petitioner’s
9 detention turns on whether and to what extent the government’s efforts are likely to
10 bear fruit.” *Hassoun v. Sessions*, No. 18-CV-586-FPG, 2019 WL 78984, at *5
11 (W.D.N.Y. Jan. 2, 2019). Accordingly, “the Government is required to demonstrate
12 the likelihood of not only the *existence* of untapped possibilities, but also of a
13 probability of success in such possibilities.” *Elashi v. Sabol*, 714 F. Supp. 2d 502,
14 506 (M.D. Pa. 2010). Here, then, “[w]hile the respondent asserts that [Mr. Reinoso-
15 Martinez’s] travel document requests” with a third country will be lodged, “this is
16 insufficient. It is merely an assertion of good-faith efforts to secure removal; it does
17 not make removal likely in the reasonably foreseeable future.” *Gilali v. Warden of*
18 *McHenry Cnty.*, No. 19-CV-837, 2019 WL 5191251, at *5 (E.D. Wis. Oct. 15,
19 2019).

20 Finally, the government does not claim that ICE may detain Mr. Reinoso-
21 Martinez because he would not give his voluntary agreement to removal to Mexico.
22 Nor could it. Immigrants are prohibited only from engaging in “*intentionally*
23 *obstructionist, bad faith tactics* that are designed to frustrate the government’s
24 attempts to effectuate a removal order” *Diouf v. Mukasey*, 542 F.3d 1222, 1232
25 (9th Cir. 2008) (emphasis added); accord *Prieto-Romero v. Clark*, 534 F.3d 1053,
26 1061 (9th Cir. 2008) (“We have previously held that an alien engages in
27 [noncompliant] behavior when he willfully refuses to cooperate with the
28 government in processing his deportation papers.”). But “good faith attempts” to

1 make use of legal pathways for avoiding deportation—like Mexico’s voluntary-
2 deportee policy—is not a bad faith attempt at obstruction. *Diouf*, 542 F.3d at 1232.
3 Likewise, telling the truth cannot be considered an act of obstruction, even if it
4 deters the foreign officials from accepting removal. *See Seretse-Khama v. Ashcroft*,
5 215 F. Supp. 2d 37, 51-53 (D.D.C. 2002). Thus, Mr. Reinoso-Martinez’s “simple
6 and honest explanation that he did not want to return to a country to which he had
7 no ties, without any accompanying affirmative lack of cooperation, is not a refusal
8 to cooperate that supports an extension of detention.” *Seretse-Khama v. Ashcroft*,
9 215 F. Supp. 2d 37, 53 (D.D.C. 2002).

10 With no evidence of any likelihood of removal at any time, the government
11 has not met its burden, and this Court must grant the petition on *Zadvydas* grounds,
12 too.

13 **II. Count 3: ICE may not remove Mr. Reinoso-Martinez to a third**
14 **country without adequate notice and an opportunity to be heard.**

15 The record therefore reflects that Mr. Reinoso-Martinez will not be removed
16 to a third country in the reasonably foreseeable future. But ICE would remove him
17 to a third country if it could, and something could unexpectedly change to make
18 that feasible. To protect against that possibility, this Court should require the
19 government to provide the notice set forth in *D.V.D. v. U.S. Dep’t of Homeland*
20 *Sec.*, No. CV 25-10676-BEM, 2025 WL 1453640, at *1 (D. Mass. May 21, 2025),
21 before removing Mr. Reinoso-Martinez to any other third country. The
22 government’s three arguments to the contrary are meritless.

23 *First*, the Supreme Court’s decision in *D.V.D.* does not affect this Court’s
24 authority to order injunctive relief in this individual case. In *D.V.D.*, the government
25 sought a stay based on procedural arguments applicable only to class actions. *Dep’t*
26 *of Homeland Sec. v. D.V.D.*, 145 S. Ct. 2153, 2160 (2025) (Sotomayor, J.,
27 dissenting). But “even if the Government [was] correct that classwide relief was
28 impermissible” in *D.V.D.*, Respondents still “remain[] obligated to comply with

1 orders enjoining [their] conduct with respect to individual plaintiffs” like Mr.
2 Reinoso-Martinez. *Id.* Thus, the Supreme Court’s decision does not override this
3 Court’s authority to grant individual injunctive relief. *See Nguyen v. Scott*, No.
4 2:25-CV-01398, 2025 WL 2419288, at *20–23 (W.D. Wash. Aug. 21, 2025).

5 *Second*, Mr. Reinoso-Martinez can seek this relief in this habeas petition
6 despite the pending class action. The Ninth Circuit held as much in analogous
7 circumstances in *Pride v. Correa*, which permitted a detained person to individually
8 challenge his own inadequate medical care despite a pending class action
9 challenging medical care at the facility. 719 F.3d 1130, 1137 (9th Cir. 2013). The
10 Ninth Circuit reasoned that “[i]ndividual claims for injunctive relief related to
11 medical treatment are discrete from the claims for systemic reform addressed in” a
12 class action. *Id.* “Consequently, where an inmate brings an independent claim for
13 injunctive relief solely on his own behalf for medical care that relates to him alone,
14 there is no duplication of claims or concurrent litigation.” *Id.* Otherwise, individual
15 plaintiffs “would be powerless to petition the courts for redress of the violation
16 until” a class action, which can take years to finish, “has been fully resolved.” *Id.*
17 The Court therefore rejected the contention that “an individual claim for injunctive
18 relief may be delayed because a pending class action seeks systemic reform relating
19 to the same general subject matter.” *Id.*

20 So too here. Mr. Reinoso-Martinez brings individual claims related to him
21 alone, rather than asking for the systemic reforms sought in *D.V.D.* And per the
22 government’s arguments in *D.V.D.*, these claims must be brought on an individual
23 basis; they cannot be brought in a class action. The government’s position therefore
24 would bar Mr. Reinoso-Martinez from seeking relief individually, even while the
25 government argues in *D.V.D.* that he cannot get that relief as part of a class. This
26 Court should reject that “heads, I win; tails, you lose” reasoning. Under *Plata*,
27 “[t]he class certification order in *D.V.D.* does not prevent this Court from
28

1 adjudicating Petitioner's claims regarding third-country removal.” *Nguyen v. Scott*,
2 796 F. Supp. 3d 703, 730 (W.D. Wash. 2025).

3 *Third*, 24 hours’ notice is not near enough to satisfy due process. Mr.
4 Reinoso-Martinez may not even have heard of the third country to which ICE
5 intends to deport him, let alone have extensive information about the dangers he
6 could face there. He will need time to research the country conditions before he can
7 make a fair, intelligent decision about whether he fears removal. And if he does
8 fear removal, but ICE does not consider his fear reasonable, he will need time to
9 obtain an attorney and file a motion to reopen. That is why the court in *D.V.D.* laid
10 out a two-step timeline for receiving notice about third countries: Petitioners need
11 10 days to decide whether to raise a fear-based claim and, if ICE decides that they
12 do not have a reasonable fear, an additional 15 days to move to reopen. *D.V.D. v.*
13 *U.S. Dep’t of Homeland Sec.*, No. CV 25-10676-BEM, 2025 WL 1453640, at *1
14 (D. Mass. May 21, 2025). This Court should follow suit.

15 **III. Section 1252(g) does not deprive this Court of jurisdiction on any issue**
16 **in this petition.**

17 Finally, contrary to the government’s arguments, § 1252(g) does not bar
18 review of “all claims arising from deportation proceedings.” *Reno v. Am.-Arab*
19 *Anti-Discrimination Comm.*, 525 U.S. 471, 482 (1999). Instead, courts “have
20 jurisdiction to decide a purely legal question that does not challenge the Attorney
21 General's discretionary authority.” *Ibarra-Perez v. United States*, __ F.4th __, 2025
22 WL 2461663, at *6 (9th Cir. Aug. 27, 2025) (cleaned up).

23 In *Ibarra-Perez*, the Ninth Circuit squarely held that § 1252(g) does not
24 prohibit immigrants from asserting a “right to meaningful notice and an opportunity
25 to present a fear-based claim before [they] [are] removed,” *id.* at *7¹—the same

26 _____
27 ¹ Mr. Ibarra-Perez raised this claim in a post-removal Federal Tort Claims Act
28 (“FTCA”) case, *id.* at *2, while this is a pre-removal habeas petition. But the
analysis under § 1252(g) remains the same, because both Mr. Ibarra-Perez and
Mr. Nguyen are challenging the same kind of agency action. *See Kong*, 62 F.4th at
616–17 (explaining that a decision about § 1252(g) in an FTCA case would also

1 claim that Mr. Reinoso-Martinez raises here with respect to third-country removals.
2 The Court reasoned that “§ 1252(g) does not prohibit challenges to unlawful
3 practices merely because they are in some fashion connected to removal orders.”
4 *Id.* Instead, 1252(g) is “limited . . . to actions challenging the Attorney General's
5 discretionary decisions to initiate proceedings, adjudicate cases, and execute
6 removal orders.” *Arce v. United States*, 899 F.3d 796, 800 (9th Cir. 2018). It does
7 not apply to arguments that the government “entirely lacked the authority, and
8 therefore the discretion,” to carry out a particular action. *Id.* at 800. Thus, § 1252(g)
9 applies to “discretionary decisions that [the Secretary] actually has the power to
10 make, as compared to the violation of his mandatory duties.” *Ibarra-Perez*, 2025
11 WL 2461663, at *9.

12 The same logic applies to all of Mr. Reinoso-Martinez’s claims, because he
13 challenges only violations of ICE’s mandatory duties under statutes, regulations,
14 and the Constitution. Accordingly, “[t]hough 8 U.S.C § 1252(g), precludes this
15 Court from exercising jurisdiction over the executive's decision to ‘commence
16 proceedings, adjudicate cases, or execute removal orders against any alien,’ this
17 Court has habeas jurisdiction over the issues raised here, namely the lawfulness of
18 [Mr. Nguyen’s] continued detention and the process required in relation to third
19 country removal.” *Y.T.D.*, 2025 WL 2675760, at *5. Many courts agree. *See, e.g.*,
20 *Kong*, 62 F.4th at 617 (“§ 1252(g) does not bar judicial review of Kong's challenge
21 to the lawfulness of his detention,” including ICE’s “fail[ure] to abide by its own
22 regulations”); *Cardoso v. Reno*, 216 F.3d 512, 516 (5th Cir. 2000) (“[S]ection
23 1252(g) does not bar courts from reviewing an alien detention order[.]”); *Parra v.*
24 *Perryman*, 172 F.3d 954, 957 (7th Cir. 1999) (1252(g) did not apply to a “claim
25 concern[ing] detention”); *J.R. v. Bostock*, No. 2:25-CV-01161-JNW, 2025 WL
26 1810210, at *3 (W.D. Wash. June 30, 2025) (1252(g) did not apply to claims that
27
28 affect habeas jurisdiction).

1 ICE was “failing to carry out non-discretionary statutory duties and provide due
2 process”); *D.V.D. v. U.S. Dep't of Homeland Sec.*, 778 F. Supp. 3d 355, 377–78 (D.
3 Mass. 2025) (1252(g) did not bar review of “the purely legal question of whether
4 the Constitution and relevant statutes require notice and an opportunity to be heard
5 prior to removal of an alien to a third country”).

6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Respectfully submitted,

Dated: January 17, 2026

s/ Katie Hurrelbrink
Katie Hurrelbrink
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Reinoso Martinez
Email: katie_hurrelbrink@fd.org