

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

Claudia Sofia Castillo Macanilla

Petitioner,

v.

PAMELA JO BONDI, *et al.*,

Respondents,

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Civ. No. 3:26-CV-00137-OLG

**RESPONSE TO FEDERAL RESPONDENTS RESPONSE TO PETITION FOR
WRIT OF HABEAS CORPUS**

INTRODUCTION

Statutory Framework for Immigration Custody Determination

1. Immigration detention is governed primarily by two provisions of the INA: Section 235(b) [8 U.S.C. § 1225(b)] and Section 236(a) [8 U.S.C. § 1226(a)]. Whereas Section 236(a) of the INA authorizes the Attorney General to release noncitizens on bond pending removal proceedings, in contrast, Section 235(b) applies to certain categories

of “arriving aliens” and mandates detention pending completion of expedited or threshold screening.

2. Congress designed INA § 236(a) [8 U.S.C. § 1226(a)] to govern the detention of individuals who, like Petitioner, are in regular removal proceedings under INA § 240 [8 U.S.C. § 1229a]. The statutory text expressly provides for release on bond, subject only to conditions ensuring appearance and protecting the community.
3. The Supreme Court has confirmed the distinction between these statutory schemes. *See Jennings v. Rodriguez*, 583 U.S. 281, 294–95 (2018) (explaining differences between § 235(b) [8 U.S.C. § 1225(b)] mandatory detention and INA § 236(a) [8 U.S.C. § 1226(a)] discretionary custody).
4. Section 236 governs the detention of noncitizens “inside the United States,” *Jennings*, 583 U.S. at 288, who are awaiting “a decision on whether [they are] to be removed from the United States,” 8 U.S.C. § 1226(a). There are two categories of detention under the statute.
5. The first category, established by Section 1226(a), provides that “[o]n a warrant issued by the Attorney General, [a noncitizen] may be arrested and detained pending a decision on whether the [noncitizen] is to be removed from the United States.” 8 U.S.C. § 1226(a) (“§ 1226” or “§ 1226(a)”). Under this “discretionary detention framework,” *Lopez Benitez*, 795 F. Supp. 3d at 484 (quoting *Gomes v. Hyde*, --- F. Supp. 3d ---, 2025 WL 1869299, at *1 (D. Mass. [REDACTED])), DHS may (1) continue to detain the noncitizen; (2) release the noncitizen on bond; or (3) release the noncitizen on conditional parole, 8 U.S.C. § 1226(a)(1)-(2).

6. When DHS exercises its discretion to detain, “§ 1226(a) and its implementing regulations require [DHS] to make an individualized custody determination.” *Velasaca v. Decker*, 458 F. Supp. 3d 224, 241 (S.D.N.Y. 2000), *appeal withdrawn sub nom. Velasaca v. Wolf*, No. 20-2153, 2020 WL 7973940 (2d Cir. Oct. 13, 2020).
7. Moreover, § 236(a)’s implementing regulations mandate that DHS officers base their individualized determination on two factors: (1) whether the noncitizen is a “danger to property or persons” and (2) whether the noncitizen is “likely to appear for any future proceeding.” 8 C.F.R. § 1236.1(c)(8).
8. If, after conducting such an assessment, DHS ultimately decides to detain the noncitizen, that noncitizen has a right to appeal that decision before an immigration judge, who must consider the same two factors. See 8 C.F.R. §§ 1003.19(d),(e) (allowing immigration judges to review bond and custody determinations); *Matter of Siniauskas*, 27 I. & N. Dec. 207, 207 (BIA 2018) (“[A noncitizen] in a custody determination under [§ 1226], must establish to the satisfaction of the Immigration Judge and the Board that he or she does not present a danger to persons or property, is not a threat to the national security, and does not pose a risk of flight.”).
9. The second category, established by Section 1226(c), provides that DHS “shall take into custody any [noncitizen]” who falls under certain enumerated categories related to criminal and terrorist activity. 8 U.S.C. § 1226(c)(1). This “mandatory detention framework . . . ‘carves out a statutory category of [noncitizens] who may *not* be released’ from detention pending the conclusion of their removal proceedings.” *Rodriguez-Acurio v. Almodovar*, --- F. Supp. 3d ---, 2025 WL 3314420, at *10 (E.D.N.Y. Nov. 28, 2025) (emphasis in original) (quoting *Jennings*, 583 U.S. at 289).

10. Despite this clear statutory scheme, DHS has invoked recent BIA decisions (i.e., *Matter of Q. Li*, 29 I&N Dec. 66 (BIA 2025); *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025)) to strip immigration judges of bond authority in cases such as those of Petitioner. Those decisions, however, cannot override the plain language of the statute.
11. In recent weeks, multiple district courts in 2025 have directly addressed the Government's efforts to expand INA § 235(b)(2)(A) [8 U.S.C. § 1225(b)(2)(A)] beyond its intended scope by assessing habeas petitions for noncitizens in similar circumstances and have repeatedly concluded that the clear and unambiguous language of INA § 236(a) [8 U.S.C. § 1226(a)] permits noncitizens to request bond hearings before the immigration court.
12. For example, in the San Antonio Division of the Western District of Texas, *Rego Guerra v. Noem*, No. 5:25-cv-01725-JKP (filed [REDACTED]), the court concluded that jurisdiction was proper though habeas relief correct statutory misclassification and to preserve the petitioner's due process rights. The court concluded the Petitioner subject to detention under INA § 236(a) [8 U.S.C. § 1226(a)], rejecting the Government's assertion that INA § 235(b) [8 U.S.C. § 1225(b)] applied. *Id.* The district court ordered petitioner's direct release under reasonable conditions finding no evidence submitted that she had violated the conditions of her initial release on recognizance when processed by DHS. *Id.*; see also e.g., *Acea-Martinez v. Noem*, No. 5:25-CV-01390-XR (filed Oct. 28, 2025) (addressing § 1225(b)(2)); *Guevara-Vasquez v. Thompson*, No. 5:25-CV-01372-XR (filed Nov. 25, 2025) (addressing § 1225(b)(1)).
13. Likewise, in *Salazar v. Dedos*, 2025 U.S. Dist. LEXIS 183335 (D.N.M. Sept. 17, 2025), the district court ordered an individualized bond hearing under 8 U.S.C. § 1226(a)

within seven days, holding that prolonged detention without such a hearing violates the Fifth Amendment's Due Process Clause.

14. Additionally, Petitioner's position is reinforced by the recent decision in *Lazaro Maldonado Bautista et al. v. Ernesto Santacruz Jr et al*, No. 5:25-cv-01873-SSS-BFM (C.D. Cal.), where the federal court granted partial summary judgment in favor of petitioners, holding that mandatory detention without individualized bond hearing violates due process and exceeds statutory authority under INA § 236(a). In that class action, the Court rejected the government's expansive interpretation of INA § 235(b) [8 U.S.C. § 1225(b)] and emphasized that noncitizens in regular removal proceedings are entitled to custody review. This ruling, supported by multiple amicus briefs, underscores the growing judicial consensus against blanket denial of bond hearings. *Cf.* Maldonado Bautista, Order of Nov. 20, 2025 (granting partial summary judgment).
15. Similarly, recent decisions from district courts within the Fifth Circuit, such as *Lopez v. Hardin*, 2025 U.S. Dist. LEXIS 188368 (N.D. Tex. 2025), and *Lopez-Arevelo v. Ripa*, 2025 U.S. Dist. LEXIS 188232 (S.D. Tex. 2025), further confirm that courts are rejecting agency efforts to apply 8 U.S.C. § 1225(b)(2)(A) to individuals who are properly subject to INA § 236(a) [8 U.S.C. § 1226(a)]. *See also Buenrostro-Mendez v. Bondi*, No. 4:25-cv-3726, slip op. at 3 (S.D. Tex. Oct. 7, 2025); *Padron Covarrubias v. Vergara*, No. 5:25-cv-00112, slip op. at 3-4 (S.D. Tex. Oct. 8, 2025) (reviewing new detention policy).
16. While Ms. Castillo Macanilla is charged as an arriving alien in his notice to appear, she is not subject to the mandatory provisions of INA § 235(b) because he was no longer "seeking admission" at the time of her re-arrest in 2025.

17. Mandatory detention under § 235 is premised on an immigration officer's determination that a noncitizen is: (1) an "applicant for admission"; (2) "seeking admission"; and (3) "not clearly and beyond a doubt entitled to be admitted." 8 U.S.C. § 1225(b)(2)(A); *see also Lopez Benitez*, 795 F. Supp. 3d at 487; J.G.O., 2025 WL 3040142, at *2-3. At the time of her 2025 re-arrest, Ms. Castillo Macanilla did not meet all three criteria, so he could not have been detained under § 235.
18. Ms. Castillo Macanilla was, and remains, "an applicant for admission." "[A]pplicant for admission" is a term of art that covers both noncitizens who "arrive[] in the United States" and those already "present in the United States who ha[ve] not been admitted." 8 U.S.C. § 1225(a)(1); *West Virginia Univ. Hosps., Inc. v. Casey*, 499 U.S. 83, 91 n.5 (1991) (noting that terms of art "depart from ordinary meaning"). "Admitted" is in turn defined as having gained "lawful entry . . . into the United States after inspection and authorization by an immigration officer." 8 U.S.C. § 1101(a)(13)(A).
19. Ms. Castillo Macanilla remains an "applicant for admission" despite having been paroled. Section 1182(d)(5)(A) specifically provides that "parole . . . shall not be regarded as an admission of the [noncitizen]." 8 U.S.C. § 1182(d)(5)(A). The applicable DHS regulation further provides that once a noncitizen's parole terminates, she is "restored to the status that he . . . had at the time of parole," 8 C.F.R. 212.5(e)(2)(i) — that of an applicant for admission. *See, e.g., United States v. Balde*, 943 F.3d 73, 84 (2d Cir. 2019) ("Parole does not change parolees' immigration status: they . . . are treated as applicants for admission into the country."). Thus, at the time of her 2025 re-arrest, Ms. Castillo Macanilla was "present in the United States" and "ha[d] not been admitted," making her an applicant for admission. 8 U.S.C. § 1225(a)(1).

20. Though she remains an applicant for admission, Ms. Castillo Macanilla was no longer “seeking admission” at the time of her 2025 re-arrest and detention. Unlike “applicant for admission,” “seeking admission” has no statutory definition. Determining the plain meaning of the phrase is straightforward. *See United States v. Rowland*, 826 F.3d 100, 108 (2d Cir. 2016) (“Where, as here, there is no statutory definition of a term, we consider ‘the ordinary, common-sense meaning of the words.’” (quoting *Dauray*, 215 F.3d at 260)); *id.* (“If the meaning is plain, the inquiry ends there.”). First, to “seek” is “to ask for” or “to try to acquire or gain.” *Seek*, *Merriam-Webster Dictionary*, <https://www.merriam-webster.com/dictionary/seek> (last visited Dec. 9, 2025). The use of a present participle, “seeking,” “necessarily implies some sort of present-tense action.” *Lopez Benitez*, 795 F. Supp. 3d at 488 (quoting *Martinez*, 792 F. Supp. 3d at 218); *see also J.G.O.*, 2025 WL 3040142, at *3; *Tumba Huamani v. Francis*, No. 25-cv-08110 (LJL), 2025 WL 3079014, at *3 (S.D.N.Y. Nov. 4, 2025). Next, the applicant must be seeking “admission,” which is statutorily defined as “lawful entry . . . into the United States.” 8 U.S.C. § 1101(a)(13)(A). “Entry” is not defined in the INA, *see generally id.* § 1101, so it can be given its “ordinary, contemporary, common meaning,” *Sandifer v. U.S. Steel Corp.*, 571 U.S. 220, 227 (2014) (quoting *Perrin v. United States*, 444 U.S. 37, 42 (1979)). That meaning is “[t]he action or an act of entering a place.” Entry, Oxford English Dictionary, <https://doi.org/10.1093/OED/8274517121> (last visited Dec. 9, 2025); *see also* Entry, Black’s Law Dictionary (12th ed. 2024) (“Any entrance of [a noncitizen] into the United States, whether voluntary or involuntary.”). Entry therefore implies a geographic limit of entering a place, here the United States’s entrance (i.e., the border). All combined, “seeking admission” means presently trying

to enter the United States at or near the border. *See J.G.O.*, 2025 WL 3040142, at *3 (noting that “seeking admission” would “require[] [a noncitizen] . . . to want to go into the country”); *Alvarez Ortiz v. Freden*, --- F. Supp. 3d ---, 2025 WL 3085032, at *7 (W.D.N.Y. Nov. 4, 2025) (observing that “seeking admission” “must refer to seeking physical entry at the border, not the legal right to enter”); *Hyppolite v. Noem*, No. 25-cv-04304 (NRM), 2025 WL 2829511, at *9 (E.D.N.Y. Oct. 6, 2025) (finding that “seeking admission” “refer[s] to those who are presenting themselves at the border, or who were recently apprehended just after entering”).

21. In sum, when DHS agents detained Ms. Castillo Macanilla in 2025, she was no longer seeking to enter the country. She was already in the United States. *See Lopez Benitez*, 795 F. Supp. 3d at 489 (holding that because “§1225(b)(2)(A) applies only to those noncitizens who are actively ‘seeking admission’ to the United States, it cannot, according to its ordinary meaning, apply to [the petitioner], because he has already been residing in the United States for several years”); *Rodriguez-Acurio*, 2025 WL 3314420, at *16 n.6 (“[A]lthough a Section 1182(d)(5)(A) parolee remains ‘at the border’ in the sense that they remain an applicant for admission, these parolees have nevertheless entered into the United States by virtue of their parole . . .”). If anything, Ms. Castillo Macanilla was seeking “to obtain a lawful means to remain here” through her asylum application. *Lopez Benitez*, 795 F. Supp. 3d at 488 n.7. Therefore, § 235 does not apply to her.

22. These holdings reflect a growing consensus that federal district courts retain jurisdiction to intervene where detention rests on a statutory misapplication and results in ongoing constitutional harm. The cumulative weight of these decisions underscores

that Ms. Castillo Macanilla is entitled to bond consideration under INA § 236(a) [8 U.S.C. § 1226(a)].

CLAIMS FOR RELIEF

Count I – Violation of INA § 236(a) [8 U.S.C. § 1226(a)]

23. Petitioner incorporates by reference the above factual allegations and re-asserts as though stated fully herein.
24. Respondents' refusal to provide Petitioner with an individualized custody redetermination hearing violates the INA and the recent decisions of multiple federal district courts from around the country, including courts within the Fifth Circuit.
25. INA § 236(a) [8 U.S.C. § 1226(a)], provides that "[o]n a warrant issued by the Attorney General, an alien may be arrested and detained pending a decision on whether the alien is to be removed from the United States," and that the Attorney General "may continue to detain the arrested alien" or "may release the alien on—(A) bond of at least \$1,500 with security approved by, and containing conditions prescribed by, the Attorney General; or (B) conditional parole."
26. By its plain text, Section 236(a) [8 U.S.C. § 1226(a)] applies to all noncitizens arrested and detained pending removal proceedings unless mandatory detention under § 236(c) [8 U.S.C. § 1226(c)] applies.
27. In interpreting the plain language of Section 236(a) [8 U.S.C. § 1226(a)], various federal district courts confirmed that noncitizens detained under Section 236(a) are statutorily eligible for individualized bond determinations before an immigration judge. Thus, the Attorney General must consider bond applications by detained aliens pending

the outcome of their removal proceedings, since immigration judges retain jurisdiction to conduct custody redetermination hearings under that provision.

28. Petitioner was served an NTA indicating her placement into removal proceedings under Section 240 of the INA [8 U.S.C. § 1229a]. Ms. Castillo Macanilla remains detained at the Karnes County Immigration Processing Center, with her case placed on the detained docket of the Pearsall Immigration Court. Because Petitioner has been detained for removal proceedings, and because she has now lived in the United States since her entry in November 2024, her custody is determined by § 236(a) [8 U.S.C. § 1226(a)], not § 235(b) [8 U.S.C. § 1225(b)].

29. By adopting a policy refusing to provide Petitioner with an individualized bond hearing that comports with INA § 236(a) [8 U.S.C. § 1226(a)], Respondents have acted contrary to statutory authority requiring consideration of such a bond application. This policy supports the conclusion that the filing of a bond application with the immigration courts is currently a futile endeavor. Petitioner's continued detention without access to an individualized custody redetermination violates the INA and must be corrected through habeas relief.

30. Accordingly, this Court should grant the writ and order that Petitioner be released, or in the alternative, receive an individualized bond hearing under INA § 236(a) [8 U.S.C. § 1226(a)], as recently made clear by the decisions of multiple federal district courts to examine these issues around the country.

Count II – Fifth Amendment Due Process Violation

31. Petitioner incorporates by reference the above factual allegations and re-asserts them as though stated fully herein.
32. Petitioner's continued detention without access to an individualized custody redetermination hearing also violates the Due Process Clause of the Fifth Amendment. Prolonged detention without bond review is arbitrary, punitive, and unconstitutional.
33. The Supreme Court has long recognized that "[f]reedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty" protected by the Due Process Clause. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001). Immigration detention is civil in nature, but it nonetheless implicates this fundamental liberty interest.
34. Because Petitioner is detained by ICE at the Karnes County Immigration Processing Center, she is categorically barred from presenting evidence that he is not a danger to the community and that she poses no flight risk. The blanket denial of access to a bond hearing strips Petitioner of the individualized determination required by due process and by the plain language of Section 236(a) [8 U.S.C. § 1226(a)].
35. Unlike noncitizens subject to mandatory detention for serious criminal offenses under Section 236(c) [8 U.S.C. § 1226(c)], Petitioner has no qualifying convictions that justify a categorical denial of release. The government has no legitimate basis to insist that Petitioner's detention be mandatory, yet he remains confined with no opportunity for release.
36. Denying Petitioner any access to a bond hearing deprives him of procedural protections guaranteed by the Due Process Clause. Moreover, prolonged detention without

meaningful review violates the substantive limits of due process, as articulated in *Zadvydas and Demore v. Kim*, 538 U.S. 510 (2003).

37. By adopting a policy refusing to provide Petitioner with an individualized bond hearing that comports with INA § 236(a) [8 U.S.C. § 1226(a)], Respondents have acted contrary to statutory authority requiring consideration of such a bond application.
38. Petitioner is an individual who has resided in the United States since November 2024. She has family and community ties in Texas. There has been no finding that she is a danger to the community or a flight risk. Yet, solely because of recent, erroneous BIA decisions—decisions not binding in the Fifth Circuit—she has been categorically denied the process to which he is entitled. This amounts to an arbitrary deprivation of liberty in violation of the Fifth Amendment.
39. Accordingly, the Court should grant habeas relief on constitutional grounds and order that Petitioner be released from custody pending the final outcome of his Section 240 [8 U.S.C. § 1229a] removal proceedings or be afforded an immediate custody redetermination hearing.

REQUEST FOR INJUNCTIVE RELIEF

40. Petitioner respectfully requests that this Court issue a preliminary injunction directing Respondents to release him under reasonable conditions of supervision, or in the alternative, to provide him with an immediate individualized custody redetermination hearing under INA § 236(a) [8 U.S.C. § 1226(a)] within seven (7) days. Upon a final hearing, Petitioner asks for permanent injunctive relief as appropriate.
41. The Supreme Court has made clear that such extraordinary relief depends on a four-factor test: likelihood of success on the merits, irreparable harm, the balance of equities,

and the public interest. *Nken v. Holder*, 556 U.S. 418, 434–35 (2009). As explained below, Petitioner satisfies each of these factors.

A. Ms. Castillo Macanilla is Likely to Succeed on the Merits of Her Petition.

42. Petitioner has a strong likelihood of success on the merits of her claims. As explained more fully hereinabove, numerous district courts, including some from within the Fifth Circuit, have already determined that noncitizens in circumstances substantially similar to those of Ms. Castillo Macanilla, who are detained under Section 236(a) [8 U.S.C. § 1226(a)], are entitled to individualized bond hearings before an immigration judge.
43. Current BIA policy prohibiting immigration judges from exercising jurisdiction over any immigration bond request that Ms. Castillo Macanilla might file—due to the Board of Immigration Appeals’ recent decisions in *Matter of Q. Li*, 29 I&N Dec. 66 (BIA 2025), and *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025)—cannot override the clear and unambiguous language of Section 236(a) [8 U.S.C. § 1226(a)]. This conclusion is further supported by the recent ruling in *Lazaro Maldonado Bautista v. Santacruz*, No. 5:25-cv-01873-SSS-BFM (C.D. Cal.), which invalidated similar policies denying bond hearings to noncitizens in regular removal proceedings.
44. Additionally, Petitioner raises a constitutional claim under the Fifth Amendment, as prolonged detention without any opportunity for individualized custody review violates due process.
45. Taken together, these statutory and constitutional grounds present not merely a plausible claim, but a compelling one. Under *Nken v. Holder*, 556 U.S. 418, 434 (2009), likelihood of success is the most critical factor in evaluating interim relief. Here, Petitioner’s claim is exceptionally strong.

B. Ms. Castillo Macanilla Will Suffer Irreparable Harm if a Preliminary Injunction Does Not Issue.

46. If this Court does not grant immediate relief, Petitioner will continue to suffer irreparable harm. The Supreme Court has recognized that “[f]reedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty” protected by the Constitution. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001). Everyday Petitioner remains confined without access to the procedures guaranteed by law constitutes a grave and irreversible injury.
47. Even if Ms. Castillo Macanilla were eventually granted a bond hearing after protracted litigation, the harm inflicted by the period of unlawful detention—loss of liberty, disruption of family life, psychological strain, and reputational damage—could never be undone. As *Nken* instructs, irreparable harm cannot be speculative; it must be actual and concrete. *Nken* 556 U.S. at 435. Mr. LastName’s ongoing imprisonment without a lawful hearing meets that standard.

C. Balance of Equities Weighs in Favor of Ms. Castillo Macanilla

48. The balance of equities tips decisively in Petitioner’s favor. On his side lies the interest in safeguarding one of the most fundamental rights recognized in our legal system—the right not to be arbitrarily detained without process. On the government’s side, the only asserted interest is administrative convenience in applying the BIA’s recent, and in this Circuit nonbinding, precedents.
49. There is no evidence that Petitioner poses a danger to the community or a risk of flight, and he has no substantial criminal history. In contrast, every additional day of unlawful

confinement inflicts significant harm on Petitioner. When weighed against each other, the equities clearly support granting immediate relief.

D. There is a Strong Public Interest in Maintaining the Pre-2025 Status Quo.

50. Finally, the public interest strongly supports the issuance of a preliminary injunction.

The Supreme Court in *Nken* explained that when the government is the opposing party, the balance of equities and the public interest merge. *Nken*, 556 U.S. at 435. The public has no interest in perpetuating unlawful detention; rather, the public's interest is served by ensuring that government agencies act within the bounds of statutory and constitutional authority.

51. Granting Petitioner an individualized custody redetermination promotes confidence in the integrity of the immigration system, reinforces respect for the rule of law, and prevents the arbitrary deprivation of liberty. Protecting fundamental due process rights is not just in Petitioner's interest, but in the interest of the public at large.

52. Each factor of the equitable test weighs heavily in Ms. Castillo Macanilla. She has shown a substantial likelihood of prevailing on the merits based on the interpretation of Section 236(a) [8 U.S.C. § 1226(a)] by various federal district courts and the Due Process Clause; he faces irreparable harm each day she remains detained without lawful process; the equities tilt overwhelmingly toward protecting her liberty; and the public interest is best served by ensuring that immigration detention is consistent with statutory and constitutional limits.

53. For these reasons, this Court should issue a Preliminary Injunction at the earliest possible opportunity, requiring Respondents to release Petitioner, or in the alternative provide an immediate custody redetermination hearing.

Dated: January 28, 2026

Respectfully submitted,



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VERIFICATION OF COUNSEL

I, Tomas P. Osuna, hereby certify that I am familiar with the case of the named Petitioner and that the facts as stated above are true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to be 'T.O.' or 'Tosuna', written in a cursive style.

Tomas P. Osuna