

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

FILED

APR 14 2026

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY TCR
DEPUTY CLERK

WILDER JAFET BORGE-TÉLLEZ,

A# ,

Petitioner, Pro Se,

v.

RENALDO CASTRO, Warden,
South Texas ICE Processing Center;
SYLVESTER ORTEGA, Field Office Director,
ICE Enforcement and Removal Operations, San Antonio;
KRISTI NOEM, Secretary,
U.S. Department of Homeland Security;
U.S. DEPARTMENT OF HOMELAND SECURITY;
PAMELA BONDI, Attorney General of the United States;
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW,
Respondents.

Civil Action No. **5:26-cv-00060**

**PETITIONER'S RESPONSE TO RESPONDENTS' ANSWER AND REQUEST FOR
IMMEDIATE ADJUDICATION**

Nature of the Action and Governing Constitutional Framework

1. This action is a petition for a writ of habeas corpus challenging the legality of Petitioner's continued detention under the authority of the United States.
2. **This petition challenges detention only and does not challenge any order of removal, admissibility determination, or underlying immigration proceedings.**
3. Petitioner is currently subject to civil immigration detention without any individualized determination of necessity, without access to a neutral decision-maker, and without any meaningful opportunity to challenge the legal basis of his confinement.
4. **Petitioner does not seek a bond hearing or custody redetermination. Petitioner seeks immediate release because continued detention is unlawful as a matter of law.**
5. The controlling question before this Court is not whether Respondents have cited a statutory provision to justify detention, but whether that detention complies with the Constitution.
6. **The legality of executive detention is a constitutional question subject to habeas review under 28 U.S.C. § 2241.** See Preiser v. Rodriguez (habeas corpus is the proper vehicle to challenge unlawful physical restraint).
7. The Fifth Amendment applies to all "persons" within the United States, regardless of immigration status.
8. **Civil immigration detention must therefore comply with the Due Process Clause.** See Yick Wo v. Hopkins (constitutional protections extend to all persons within the jurisdiction); Zadvydas v. Davis (civil detention must remain limited and non-punitive).
9. Respondents attempt to frame this case as a statutory classification dispute under 8 U.S.C. § 1225(b).
10. That framing is incomplete and legally insufficient because statutory authority cannot override constitutional limitations on detention.
11. **Even if Respondents' statutory classification were accepted as true, continued detention without individualized constitutional process violates the Fifth Amendment as a matter of law.**
12. The writ of habeas corpus exists to ensure that executive detention remains subject to judicial review and constitutional limits.

13. **The Suspension Clause requires that this Court retain authority to examine the legality of Petitioner's detention and to order release where that detention cannot be justified under the Constitution. See *Boumediene v. Bush*; *INS v. St. Cyr*.**
14. Accordingly, this case presents a straightforward legal question: whether Respondents may continue to detain Petitioner without any individualized determination, without any meaningful process, and without any available forum to challenge that detention.
15. **Because the answer is no, Petitioner's continued detention is unconstitutional and unlawful as a matter of law, and immediate release is required.**

Respondents Mischaracterize the Petition and Fail to Address the Controlling Constitutional Question

16. Respondents' response is premised on a fundamental mischaracterization of the claims presented in the petition.
17. Rather than addressing the legality of Petitioner's continued detention, Respondents recast the petition as a request for a bond hearing or discretionary custody determination.
18. That characterization is incorrect.
19. **Petitioner does not seek a bond hearing, custody redetermination, or any form of discretionary relief.**
20. **Petitioner challenges the legality of continued detention itself and seeks immediate release as the only constitutionally sufficient remedy.**
21. Respondents argue at length that individuals detained under 8 U.S.C. § 1225(b) are not entitled to bond hearings and that immigration judges lack jurisdiction to conduct custody redeterminations.
22. Those arguments, even if accepted, do not resolve the question presented in this case.
23. The absence of a bond hearing does not establish the legality of detention; it underscores the absence of any meaningful process to test that detention.
24. **Respondents' position confirms that Petitioner has no access to an individualized custody determination before a neutral decision-maker.**
25. By focusing on the unavailability of bond proceedings, Respondents fail to address the central constitutional issue: whether the government may continue to detain a person

without any individualized determination of necessity and without any meaningful opportunity to challenge the legal basis of that detention.

26. The petition raises a pure question of law concerning the constitutional limits of executive detention.
27. **Respondents do not identify any process that satisfies due process, nor do they demonstrate that any constitutionally sufficient procedure has been provided.**
28. Instead, Respondents rely exclusively on statutory classification and assert that such classification is sufficient, by itself, to justify continued detention.
29. That position improperly elevates statutory labeling over constitutional requirements.
30. **The Constitution does not permit the government to impose detention based solely on a statutory designation while eliminating all meaningful avenues of review.**
31. Respondents' reliance on statutory authority therefore fails to address the governing question before this Court.
32. The issue is not whether Respondents can cite § 1225(b), but whether continued detention under that authority complies with the Fifth Amendment.
33. **Because Respondents have not addressed that constitutional requirement, their response fails to justify Petitioner's continued detention as a matter of law.**

The Fifth Amendment Applies to Petitioner and Governs Civil Immigration Detention

34. The Fifth Amendment to the United States Constitution provides that no person shall be deprived of liberty without due process of law.
35. **This protection extends to all "persons" within the United States, regardless of immigration status.** See *Yick Wo v. Hopkins* (holding that the Constitution protects all persons within the jurisdiction of the United States).
36. Respondents suggest that constitutional protections are limited or inapplicable based on Petitioner's alleged status under the immigration laws.
37. That position is inconsistent with longstanding Supreme Court precedent.
38. **The Constitution does not condition due process protections on lawful admission or immigration classification.**
39. Civil immigration detention, while regulatory in nature, remains subject to constitutional limitations.

40. **The government may not detain an individual in civil proceedings in a manner that is arbitrary, indefinite, or lacking in procedural safeguards.** See *Zadvydas v. Davis* (recognizing that civil detention must be limited and justified by its regulatory purpose).
41. The Supreme Court has repeatedly emphasized that freedom from physical restraint lies at the core of the liberty protected by the Due Process Clause.
42. **Detention without adequate procedural protections therefore raises serious constitutional concerns and requires meaningful judicial review.**
43. The writ of habeas corpus serves as the primary mechanism through which courts ensure that executive detention complies with constitutional requirements.
44. **The Constitution guarantees a meaningful opportunity to challenge unlawful detention before a neutral decision-maker.** See *Boumediene v. Bush* (requiring meaningful judicial review of executive detention); *INS v. St. Cyr* (confirming the continued availability of habeas review absent clear suspension).
45. Respondents' position would effectively eliminate any meaningful review of detention by relying solely on statutory classification.
46. That approach is incompatible with the Constitution, which requires that the legality of detention remain subject to judicial scrutiny.
47. **The Due Process Clause does not permit detention to be imposed and maintained without a constitutionally sufficient process to test its validity.**
48. Accordingly, regardless of the statutory framework invoked by Respondents, Petitioner remains entitled to the protections of the Fifth Amendment.
49. **Because no constitutionally adequate process has been provided, Petitioner's continued detention violates the Due Process Clause as a matter of law.**

Detention Is Distinct from Admission and Remains Subject to Habeas Review

50. Respondents' argument relies on conflating the law governing admission and removal with the law governing civil detention.
51. That conflation is legally incorrect and obscures the constitutional issue before this Court.
52. **Detention and removal are distinct legal questions, and each must be independently justified under the Constitution.**

53. Immigration proceedings address questions of admissibility, removability, and eligibility for relief.
54. By contrast, this action challenges the legality of Petitioner's physical restraint by the Executive.
55. **The existence of removal proceedings does not, by itself, justify continued detention.**
56. The Supreme Court has made clear that habeas corpus is the proper vehicle to challenge unlawful custody, regardless of the underlying legal context.
57. **Where an individual is held in custody in violation of the Constitution, federal courts retain authority to order release.** See *Preiser v. Rodriguez* (recognizing habeas as the appropriate mechanism to challenge unlawful detention).
58. Respondents' reliance on statutory provisions governing admission does not eliminate the Court's obligation to review the legality of detention.
59. **Statutory limits on immigration proceedings do not displace habeas jurisdiction over unconstitutional detention.** See *INS v. St. Cyr* (holding that habeas review survives absent a clear and express suspension).
60. The distinction between detention and admission is critical because Respondents attempt to use doctrines developed in the admission context to shield detention from constitutional review.
61. That approach is inconsistent with the fundamental role of habeas corpus as a check on executive detention.
62. **Even where the government possesses authority to regulate admission, it may not detain individuals in violation of the Constitution.**
63. The Constitution imposes independent limits on the government's power to restrain liberty, regardless of the immigration context in which that restraint arises.
64. Accordingly, this Court must evaluate Petitioner's detention as a standalone constitutional question.
65. **Because detention must be independently justified and remains subject to habeas review, Respondents cannot rely on admission-based doctrines to avoid constitutional scrutiny.**

Respondents' Reliance on § 1225(b) Does Not Eliminate Constitutional Limits on Detention

66. Respondents rely heavily on 8 U.S.C. § 1225(b) to argue that Petitioner's detention is mandatory and not subject to review.
67. That reliance is misplaced because statutory authority does not override constitutional limitations on executive detention.
68. **The Constitution remains the supreme law governing the legality of detention, and no statute may authorize detention in violation of the Fifth Amendment.**
69. Respondents assert that individuals classified under § 1225(b) are not entitled to bond hearings or discretionary custody determinations.
70. Even if that assertion is accepted, it does not resolve the constitutional question presented here.
71. **The absence of a bond hearing does not establish the legality of detention; it highlights the absence of any meaningful process to test that detention.**
72. Respondents' position would allow detention to be imposed categorically, without any individualized determination, based solely on statutory designation.
73. That approach is incompatible with due process, which requires that deprivations of liberty be accompanied by constitutionally sufficient procedural safeguards.
74. **Detention may not be justified solely by statutory labeling where no individualized process exists to assess its necessity.**
75. The Supreme Court has recognized that civil detention must remain regulatory and reasonably related to a legitimate governmental purpose.
76. **Where detention lacks procedural safeguards and individualized review, it ceases to be regulatory and becomes constitutionally impermissible. See Zadvydas v. Davis.**
77. Respondents' interpretation of § 1225(b) would permit indefinite or prolonged detention without any mechanism to challenge its validity.
78. Such a system would effectively insulate executive detention from judicial review, contrary to the role of habeas corpus.
79. **The Constitution does not permit the government to rely on statutory classification to eliminate all meaningful review of detention.**
80. Accordingly, even accepting Respondents' statutory position, detention must still comply with the Fifth Amendment.

81. **Because Respondents have not demonstrated that Petitioner's detention is supported by any constitutionally sufficient process, continued detention cannot be sustained as a matter of law.**

Even Accepting Respondents' Statutory Position, Continued Detention Without Constitutional Process Is Unlawful as a Matter of Law

82. Even assuming, arguendo, that Respondents have correctly classified Petitioner under 8 U.S.C. § 1225(b), that classification does not end the constitutional inquiry.
83. The Constitution imposes independent limits on the government's authority to detain, regardless of the statutory framework invoked.
84. **Statutory authority cannot authorize detention that violates the Fifth Amendment.**
85. Respondents' position rests on the premise that statutory classification alone is sufficient to justify continued detention.
86. That premise is legally incorrect because due process requires more than categorical detention based on a statutory label.
87. **The Constitution requires that continued detention be supported by a constitutionally sufficient process, including an individualized determination of necessity.**
88. Here, no such process has been provided.
89. Petitioner has not received a bond hearing, a custody redetermination, or any form of individualized assessment before a neutral decision-maker.
90. **Detention has been imposed and maintained automatically, without any evaluation of whether it is necessary in this particular case.**
91. The Supreme Court has made clear that civil detention must bear a reasonable relationship to its regulatory purpose and must be accompanied by adequate procedural safeguards.
92. **Where detention is imposed without individualized process, the risk of erroneous deprivation of liberty is substantial and constitutionally intolerable.** See *Mathews v. Eldridge* (requiring procedural safeguards where liberty interests are at stake).
93. Respondents do not identify any process that satisfies constitutional requirements.
94. Instead, they rely exclusively on statutory authority while simultaneously acknowledging that no bond hearing or custody review is available.

- 95. **That position confirms that Petitioner is subject to detention without any meaningful procedural protection.**
- 96. The Constitution does not permit such a result.
- 97. **Even where Congress authorizes detention, the Executive must implement that detention in a manner consistent with due process.**
- 98. Where no constitutionally adequate process exists, continued detention cannot be sustained.
- 99. Accordingly, even accepting Respondents' statutory position in full, Petitioner's continued detention without individualized constitutional process violates the Fifth Amendment.
- 100. **For that reason, detention is unlawful as a matter of law and cannot continue.**

The Absence of Any Individualized Determination Violates Due Process Under Mathews v. Eldridge

- 101. The Fifth Amendment requires that any deprivation of liberty be accompanied by constitutionally sufficient procedural safeguards.
- 102. The Supreme Court has established that the adequacy of such safeguards is evaluated under the framework set forth in Mathews v. Eldridge.
- 103. **Under that framework, the Court must assess the private interest at stake, the risk of erroneous deprivation, and the government's interest.**
- 104. The private interest at issue here is the most fundamental interest protected by the Constitution: freedom from physical restraint.
- 105. **Detention represents a complete deprivation of liberty and therefore requires the highest level of constitutional protection. See Zadvydas v. Davis.**
- 106. The risk of erroneous deprivation in this case is extraordinarily high.
- 107. Petitioner has received no bond hearing, no custody review, and no individualized determination before a neutral decision-maker.
- 108. **Without any procedural safeguards, detention operates automatically and without any mechanism to ensure its necessity or legality.**
- 109. The absence of process eliminates any opportunity for Petitioner to present evidence, contest the basis of detention, or obtain review by an impartial adjudicator.

- 110. **Such a system creates a substantial and constitutionally unacceptable risk that an individual will be deprived of liberty without justification.**
- 111. The government's interest does not justify this lack of process.
- 112. While the government may assert general interests in immigration enforcement, those interests do not permit detention without procedural safeguards.
- 113. **Where no individualized findings of necessity are made, continued detention cannot be justified as regulatory and instead becomes arbitrary.**
- 114. The Supreme Court has made clear that civil detention must remain non-punitive and reasonably related to its purpose.
- 115. **Detention imposed without individualized review ceases to be regulatory and becomes constitutionally impermissible.**
- 116. Here, the balance of all factors weighs decisively in favor of requiring meaningful process.
- 117. **Because no individualized determination has been provided, Petitioner's continued detention violates due process as a matter of law.**
- 118. Accordingly, under the governing framework of *Mathews v. Eldridge*, the absence of any constitutionally sufficient procedure renders Petitioner's detention unlawful.

Respondents' Position Eliminates Any Meaningful Opportunity to Challenge Detention

- 119. Respondents' position results in a system in which Petitioner has no meaningful opportunity to challenge the legality of his detention.
- 120. Under Respondents' own theory, the Immigration Judge lacks jurisdiction to conduct a bond hearing or custody redetermination.
- 121. Respondents further maintain that no discretionary release is available under the asserted statutory framework.
- 122. **As a result, Petitioner is left without access to any neutral decision-maker to evaluate the necessity or legality of continued detention.**
- 123. The absence of any available forum is not a collateral consequence of detention; it is a central feature of Respondents' position.
- 124. By relying on statutory classification to foreclose all administrative review, Respondents effectively eliminate any mechanism for individualized consideration.

125. **Detention is thus imposed and maintained without any process capable of testing its validity.**
126. The Constitution does not permit a system in which an individual may be detained indefinitely without any meaningful opportunity to be heard.
127. **Due process requires that a person deprived of liberty have access to a procedure through which the legality of that deprivation can be challenged.**
128. Respondents do not identify any existing procedure that satisfies this requirement.
129. There is no hearing, no review, and no administrative pathway through which Petitioner may contest continued detention.
130. **The complete absence of any forum to challenge detention renders the system constitutionally deficient.**
131. In such circumstances, habeas corpus serves as the only mechanism through which the legality of detention may be examined.
132. **The writ exists precisely to ensure that executive detention does not become insulated from judicial review.** See *Boumediene v. Bush*.
133. Respondents' position would eliminate that safeguard by combining mandatory detention with the absence of any review.
134. **The Constitution does not permit the government to impose detention while simultaneously eliminating all avenues to challenge it.**
135. Accordingly, because Respondents' framework provides no meaningful opportunity to contest detention, it violates the fundamental requirements of due process.

Habeas Corpus Remains the Only Available Remedy to Test the Legality of Detention

136. In the absence of any administrative or statutory mechanism to challenge continued detention, habeas corpus remains the only available remedy.
137. **The writ of habeas corpus exists to ensure that executive detention is subject to judicial review and constitutional limits.**
138. The Supreme Court has consistently held that habeas review must remain available to test the legality of detention.
139. **Absent a clear and express suspension, courts retain jurisdiction to examine whether detention violates the Constitution.** See *INS v. St. Cyr*.

140. The Suspension Clause protects the fundamental right to seek judicial review of unlawful detention.
141. **Meaningful review must be available to ensure that detention is not arbitrary or unconstitutional.** See *Boumediene v. Bush*.
142. Respondents' position would eliminate any such review by combining mandatory detention with the absence of administrative procedures.
143. Under that framework, Petitioner would have no forum in which to challenge the legality of his confinement.
144. **Such a result is incompatible with the constitutional guarantee of habeas corpus.**
145. The Court's role in habeas proceedings is to determine whether the government has lawful authority to detain.
146. **Where detention cannot be justified under the Constitution, the Court has both the authority and the obligation to order release.** See *Preiser v. Rodriguez*.
147. Here, Respondents do not identify any alternative mechanism through which Petitioner may obtain review of his detention.
148. The absence of any such mechanism confirms that habeas is not only appropriate, but necessary.
149. **Without habeas review, Petitioner's detention would remain entirely insulated from constitutional scrutiny.**
150. Accordingly, habeas corpus provides the only means through which this Court may examine and remedy the unlawful detention at issue.
151. **Because no other remedy exists, the Court must exercise its habeas authority to determine the legality of detention and order appropriate relief.**

Exhaustion Does Not Bar Review and Is Excused as a Matter of Law

152. Respondents suggest that Petitioner must exhaust administrative remedies before seeking habeas relief.
153. That argument fails because exhaustion in this context is not jurisdictional and does not bar this Court's review.
154. **Exhaustion of administrative remedies in immigration detention cases is a prudential doctrine, not a jurisdictional requirement.**

155. Courts retain authority to hear habeas petitions challenging unlawful detention even where administrative processes have not been completed.
156. **Constitutional claims concerning unlawful detention are properly brought before the federal courts without requiring exhaustion of unavailable or ineffective remedies.**
157. In this case, no meaningful administrative remedy exists to exhaust.
158. The Immigration Judge lacks jurisdiction to conduct a bond hearing or custody redetermination under Respondents' asserted framework.
159. Respondents themselves maintain that no discretionary release is available.
160. **Accordingly, there is no administrative mechanism through which Petitioner can challenge the legality of continued detention.**
161. Requiring exhaustion under these circumstances would impose an impossible condition.
162. **The law does not require exhaustion of remedies that do not exist or cannot provide relief.**
163. Moreover, exhaustion is excused where pursuit of administrative remedies would be futile.
164. Here, any attempt to seek relief through administrative channels would be futile because those channels do not provide a forum for individualized review.
165. **Futility alone is sufficient to excuse exhaustion in habeas proceedings.**
166. Respondents' position is internally inconsistent.
167. They argue that Petitioner must exhaust administrative remedies while simultaneously asserting that no such remedies are available.
168. **The Constitution does not permit the government to foreclose all avenues of relief and then invoke exhaustion as a barrier to judicial review.**
169. Accordingly, exhaustion does not bar this Court's jurisdiction and is excused as a matter of law.
170. **Petitioner is entitled to immediate judicial review of the legality of detention through habeas corpus.**

Respondents Fail to Provide Any Justification for Petitioner's Continued Detention

171. Respondents do not provide any individualized justification for Petitioner's continued detention.

- 172. Their response relies exclusively on statutory classification and does not address whether detention is necessary in this particular case.
- 173. **The absence of individualized findings is dispositive because continued detention must be justified by more than categorical labeling.**
- 174. Respondents do not assert that Petitioner poses a danger to the community.
- 175. Respondents do not assert that Petitioner presents a risk of flight based on any individualized assessment.
- 176. **No evidence is presented to support the necessity of continued detention.**
- 177. Instead, Respondents rely on the proposition that detention is mandatory under the statute and therefore requires no further justification.
- 178. That position is inconsistent with the Constitution, which requires that deprivations of liberty be supported by adequate procedural safeguards and individualized consideration.
- 179. **Detention cannot be sustained solely on the basis of statutory designation without any inquiry into necessity.**
- 180. The absence of any individualized determination confirms that detention is being imposed automatically.
- 181. Such automatic detention, without process or justification, is incompatible with due process.
- 182. **Where no individualized findings exist, detention is arbitrary and constitutionally impermissible.**
- 183. Respondents also fail to identify any process through which Petitioner may obtain review of detention.
- 184. As a result, detention continues without oversight, without justification, and without any mechanism to ensure its legality.
- 185. **The continued deprivation of liberty under these conditions cannot be sustained under the Fifth Amendment.**
- 186. Accordingly, Respondents have failed to meet their burden of justifying Petitioner's continued detention.
- 187. **In the absence of any individualized justification or constitutionally sufficient process, detention is unlawful as a matter of law.**

Petitioner's Detention Is Unlawful as a Matter of Law

188. The undisputed record establishes that Petitioner is currently detained without any individualized determination of necessity and without any constitutionally sufficient process.
189. Respondents do not contest that no bond hearing, custody review, or neutral adjudication has been provided.
190. **Detention has therefore been imposed and maintained without the procedural safeguards required by the Fifth Amendment.**
191. The Constitution requires that deprivations of liberty be accompanied by meaningful process and subject to judicial review.
192. Where such process is absent, continued detention cannot be sustained.
193. **A system that permits detention without any individualized determination or opportunity to be heard is constitutionally deficient.**
194. Respondents' reliance on statutory classification does not cure this defect.
195. Even accepting Respondents' statutory position in full, detention must still comply with constitutional requirements.
196. **Because no constitutionally adequate process has been provided, detention is unlawful regardless of the statutory framework invoked.**
197. The absence of any available forum to challenge detention further confirms the constitutional violation.
198. Without habeas review, Petitioner would remain subject to detention without any meaningful opportunity to contest its legality.
199. **The Constitution does not permit detention to exist in the absence of judicial oversight and procedural safeguards.**
200. The facts relevant to this determination are not in dispute.
201. Respondents' own position confirms the absence of process, the unavailability of review, and the reliance on categorical detention.
202. **Because the material facts are undisputed, this case presents a pure question of law suitable for immediate resolution.**
203. Accordingly, Petitioner's continued detention violates the Fifth Amendment.
204. **Detention is unlawful as a matter of law and cannot continue under the Constitution.**

The Court Should Adjudicate the Petition Immediately

- 205. The record before this Court is complete and does not require further factual development.
- 206. Respondents have filed their response, and the material facts relevant to the legality of detention are not in dispute.
- 207. **This case therefore presents a pure question of law appropriate for immediate adjudication.**
- 208. Habeas corpus proceedings are intended to provide a prompt and effective remedy for unlawful detention.
- 209. **Where the legality of detention can be resolved on the existing record, no additional briefing or evidentiary proceedings are required.** See Preiser v. Rodriguez.
- 210. Further delay would serve no legitimate purpose and would only prolong unconstitutional detention.
- 211. **The continued deprivation of liberty in the absence of a legal justification constitutes ongoing irreparable harm.**
- 212. Respondents have had a full opportunity to present their arguments and have not identified any factual dispute requiring resolution.
- 213. Their position rests entirely on legal assertions that have now been fully addressed.
- 214. **No additional submissions from Respondents are necessary for this Court to determine the legality of detention.**
- 215. The Court is therefore in a position to resolve this matter based on the pleadings and governing law.
- 216. **Judicial economy and the constitutional urgency of habeas proceedings both favor immediate adjudication.**
- 217. Because detention is unlawful as a matter of law, no further proceedings are required.
- 218. **The Court should grant the petition and order Petitioner's immediate release without delay.**

Prayer for Relief

For the foregoing reasons, Petitioner respectfully requests that this Court grant the writ of habeas corpus and provide the following relief.

- a. Grant the Petition for Writ of Habeas Corpus and order Petitioner's immediate release from custody.**
- b. Declare that Petitioner's continued detention violates the Fifth Amendment and is unlawful as a matter of law.**
- c. Prohibit Respondents from re-detaining Petitioner under the same statutory authority absent a lawful and individualized determination consistent with due process.**
- d. Enjoin Respondents from transferring Petitioner outside the jurisdiction of this Court without prior authorization.**
- e. Stay Petitioner's removal pending resolution of this habeas proceeding and enforcement of this Court's order.**
- f. Require Respondents to confirm compliance with this Court's order within a specified time period set by the Court.**
- g. Grant such other and further relief as this Court deems just and proper pursuant to 28 U.S.C. § 2241.**

Respectfully submitted,

x Wilder Borge Tellez
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