

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

Milanyely Franyely CALDERA MORENO,

Petitioner,

v.

Jason STREEVAL, Warden of Stewart
Detention Center, in his official capacity,
et al.,

Respondents.

Case No.: 4:26-cv-00077-CDL-ALS

REPLY TO RESPONDENTS' ABBREVIATED RESPONSE TO PETITION
AND RESPONSE TO ORDER TO SHOW CAUSE

Petitioner rests on the allegations and legal positions presented in her Habeas Petition as the weight of authority—including authority from this Court—on the relevant legal issues is so clearly in his favor that no substantive reply is necessary. *See, e.g., J.A.M. v. Streeval*, No. 25-cv-342, 2025 WL 3050094 (M.D. Ga. Nov. 1, 2025) (Land, J.) (granting habeas petition based on identical legal issues). In their Abbreviated Response, Respondents merely repeat their legal arguments concerning mandatory detention and eligibility for a bond hearing that they have repeated countless times in this Court and in courts nationwide. *See generally id.* (addressing and analyzing arguments). Thus, Petitioner respectfully asks that this Court grant Petitioner's petition for a writ of habeas corpus and order that a bond hearing be held pursuant to 8 U.S.C. § 1225 so that Petitioner will have the opportunity to be reunited with her family.

Dated: January 24, 2026

Respectfully submitted,

/s/ Thomas Evans

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