

FILED

MAR 20 2026

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

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

ISIDRO CAMPOS PADILLA,

A-Number: 

Petitioner,

v.

WARDEN OF THE SOUTH TEXAS ICE PROCESSING CENTER;
FIELD OFFICE DIRECTOR,
ENFORCEMENT AND REMOVAL OPERATIONS,
SAN ANTONIO FIELD OFFICE,
U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT;
SECRETARY OF THE DEPARTMENT OF HOMELAND SECURITY;
U.S. DEPARTMENT OF HOMELAND SECURITY;
ATTORNEY GENERAL OF THE UNITED STATES;
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW,
Respondents.

Civil Action No. 5:26-CV-000105-FB

**PETITIONER'S REPLY IN SUPPORT OF HABEAS CORPUS AND REQUEST FOR
IMMEDIATE ADJUDICATION**

CONSTITUTIONAL PROTECTIONS APPLY TO PERSONS WITHIN THE UNITED STATES

1. The **Fifth Amendment to the United States Constitution** provides that no “**person**” shall **be deprived of liberty without due process of law**, and this protection applies to all persons within the territorial jurisdiction of the United States, regardless of citizenship.
2. The Supreme Court has long held that constitutional protections extend to noncitizens physically present in the United States. **Yick Wo v. Hopkins, 118 U.S. 356, 369 (1886)**.
3. In **Yick Wo**, the Court made clear that the Constitution “**is not confined to the protection of citizens**” but **applies to all persons within the United States**, thereby establishing a foundational principle of constitutional law.
4. The Supreme Court reaffirmed this principle in **Zadvydas v. Davis, 533 U.S. 678, 693 (2001)**, holding that once an individual is present in the United States, the **Due Process Clause applies to that person**.
5. In **Landon v. Plasencia, 459 U.S. 21, 32 (1982)**, the Court held that a noncitizen who has developed ties within the United States is entitled to **due process protections in removal-related proceedings**.
6. The Court in **Plasencia** emphasized that the constitutional analysis changes once a noncitizen has “**entered the country and developed substantial connections**”, recognizing a protected liberty interest.
7. Petitioner Isidro Campos has resided in the United States for more than two decades, has established a family, and has developed substantial and continuous ties within this country.
8. Petitioner is therefore not situated as an individual seeking initial admission at the border, but as a person who has long been **physically present within the United States and entitled to full constitutional protection**.
9. Respondents attempt to invoke doctrines applicable to **arriving aliens** in order to limit constitutional protections, but those doctrines apply, if at all, only in the narrow context of individuals at or near the border seeking entry.
10. The government has not presented any evidence demonstrating that Petitioner was apprehended at the border, processed as an arriving alien, or subjected to expedited removal procedures.

11. The government has not provided any **record of entry, inspection documentation, or biometric evidence** establishing that Petitioner presented himself at a port of entry.
12. Where the government seeks to impose a **border-based classification under 8 U.S.C. §1225(b)**, it bears the burden of proving the factual predicate for that classification.
13. Respondents have failed to meet that burden, as they have not established that Petitioner entered through the border or qualifies as an arriving alien under the statute.
14. The Constitution does not permit the government to retroactively impose a **legal fiction of entry** to deny due process protections to a person who has long resided within the United States.
15. Accordingly, Petitioner is entitled to **full Fifth Amendment protections**, including the right to be free from **arbitrary and prolonged civil detention without meaningful process**.

RESPONDENTS' MISUSE OF DHS v. THURAISSIGIAM

16. Respondents rely on **DHS v. Thuraissigiam, 591 U.S. ___, 140 S. Ct. 1959 (2020)** in an attempt to limit the constitutional protections afforded to Petitioner.
17. However, **Thuraissigiam** is expressly limited to the context of **expedited removal proceedings involving an individual apprehended shortly after crossing the border**.
18. The Supreme Court in **Thuraissigiam** emphasized that the petitioner in that case was **"apprehended just 25 yards from the border"** and had **not effected entry into the United States**.
19. The Court's analysis in **Thuraissigiam** was therefore grounded in the **historical limits of habeas corpus as applied to individuals seeking initial admission at the border**.
20. The present case is fundamentally different.
21. Petitioner Isidro Campos has been physically present in the United States for more than two decades and was living within the interior of the country at the time of his detention.
22. Petitioner was not apprehended at or near the border, was not placed in expedited removal, and is not challenging an expedited removal order.
23. Respondents have not provided any evidence demonstrating that Petitioner falls within the narrow category of individuals addressed in **Thuraissigiam**.

24. By invoking **Thuraissigiam**, Respondents attempt to extend a **border-specific doctrine to an interior detention case**, which is not supported by the holding of that decision.
25. The Supreme Court has repeatedly distinguished between individuals at the threshold of entry and those who have established presence within the United States. See **Landon v. Plasencia**, 459 U.S. 21 (1982); **Zadvydas v. Davis**, 533 U.S. 678 (2001).
26. Unlike the petitioner in **Thuraissigiam**, Petitioner here is entitled to **full Fifth Amendment protections** because he is physically present within the United States.
27. Respondents' reliance on **Thuraissigiam** fails to acknowledge these critical distinctions and omits the factual limitations that define the scope of that decision.
28. Even assuming, arguendo, that Respondents' theory under 8 U.S.C. §1225(b) were correct, their position would eliminate any available mechanism for Petitioner to challenge his detention.
29. Under Respondents' framework, Petitioner would be denied a bond hearing, denied review before an Immigration Judge, and simultaneously barred from meaningful habeas review.
30. Such a position would result in **unreviewable executive detention**, a result that is incompatible with the **Suspension Clause** and the historic purpose of the writ of habeas corpus.
31. The Supreme Court has made clear that habeas corpus exists to prevent precisely this type of detention without judicial review. See **Boumediene v. Bush**, 553 U.S. 723 (2008); **INS v. St. Cyr**, 533 U.S. 289 (2001).
32. Respondents' reliance on **Thuraissigiam** therefore not only misapplies the holding of that case, but also underscores the necessity of habeas review in this case.
33. Accordingly, **Thuraissigiam** does not control here and cannot be used to deny Petitioner the constitutional protections to which he is entitled.

UNLAWFUL MISCLASSIFICATION UNDER 8 U.S.C. §1225(b)

34. Respondents assert that Petitioner is subject to mandatory detention under 8 U.S.C. §1225(b) by classifying him as an "applicant for admission."
35. This classification is unsupported by the factual record and contrary to the statutory framework governing immigration detention.

36. The Immigration and Nationality Act establishes distinct detention schemes, with **8 U.S.C. §1225(b)** applying to individuals at or near the border seeking admission, and **8 U.S.C. §1226(a)** governing individuals apprehended within the interior of the United States.
37. The Supreme Court has recognized this distinction, explaining that **§1225 applies to arriving aliens**, while **§1226 governs detention of noncitizens already present in the United States**. See **Jennings v. Rodriguez**, **583 U.S. 281 (2018)**.
38. Petitioner does not fall within the statutory category of an arriving alien.
39. Petitioner has resided in the United States for over two decades and was living within the interior of the country at the time of his detention.
40. Respondents have not presented any evidence demonstrating that Petitioner was apprehended at or near the border or that he sought admission at a port of entry.
41. Respondents have not produced any **record of entry, inspection documentation, or biometric evidence** linking Petitioner to a border encounter.
42. In the absence of such evidence, Respondents cannot meet their burden of establishing that Petitioner is properly classified under **§1225(b)**.
43. Instead, Respondents rely on a categorical legal assertion that any noncitizen who entered without inspection must be treated as an applicant for admission, regardless of the passage of time or circumstances of apprehension.
44. That position ignores the statutory structure and collapses the distinction between **§1225** and **§1226**, effectively subjecting all long-term residents to mandatory detention without review.
45. Such an interpretation is inconsistent with the text, structure, and purpose of the Immigration and Nationality Act.
46. Moreover, Respondents' position relies on **Matter of Yajure Hurtado**, **29 I. & N. Dec. 216 (BIA 2025)**, which represents a significant departure from longstanding agency practice.
47. For decades, individuals apprehended within the interior of the United States after entry were detained under **§1226(a)** and afforded the opportunity to seek release on bond before an Immigration Judge.
48. Respondents' attempt to apply **§1225(b)** to Petitioner disregards this historical framework and imposes a retroactive reclassification unsupported by the record.

- 49. The government cannot rely on a legal fiction to impose mandatory detention where it has failed to establish the factual predicate required by the statute.
- 50. Because Respondents have not proven that Petitioner entered through the border or qualifies as an arriving alien, their reliance on **§1225(b)** is unlawful.
- 51. Accordingly, Petitioner's detention must be evaluated under the correct statutory framework, which requires an individualized custody determination and the availability of bond.

EXHAUSTION OF REMEDIES IS PRUDENTIAL, NOT JURISDICTIONAL

- 52. Respondents suggest that habeas relief is improper due to an alleged failure to exhaust administrative remedies.
- 53. That argument fails as a matter of law because **exhaustion in immigration habeas proceedings is not jurisdictional, but prudential.**
- 54. The Fifth Circuit has recognized that exhaustion requirements in this context are **judicially created and subject to equitable exceptions**, not statutory mandates.
- 55. Unlike other areas of law, there is **no statutory exhaustion requirement under 28 U.S.C. §2241** for challenges to unlawful detention.
- 56. Courts therefore retain full authority to hear habeas petitions where exhaustion would be **futile, inadequate, or unavailable.**
- 57. Here, Respondents' own position confirms that exhaustion is not only impractical, but impossible.
- 58. Respondents assert that Petitioner is detained under **8 U.S.C. §1225(b)**, a provision that they claim eliminates **Immigration Judge jurisdiction over bond proceedings.**
- 59. At the same time, Respondents suggest that Petitioner should have pursued administrative remedies before seeking habeas relief.
- 60. These two positions are irreconcilable.
- 61. If, as Respondents contend, **no Immigration Judge has authority to review Petitioner's detention**, then there exists no administrative remedy capable of being exhausted.
- 62. A detainee cannot be required to exhaust a remedy that the government simultaneously asserts does not exist.

- 63. Courts have consistently rejected such contradictory positions, recognizing that exhaustion is excused where the administrative process offers **no meaningful opportunity for relief**.
- 64. Moreover, habeas corpus has historically functioned as a **primary and immediate safeguard against unlawful detention**, not a remedy of last resort. See *INS v. St. Cyr*, **533 U.S. 289 (2001)**.
- 65. Requiring exhaustion under these circumstances would improperly elevate a prudential doctrine over the **fundamental constitutional protection of liberty**.
- 66. Because Respondents' own arguments foreclose any available administrative remedy, exhaustion is **excused as futile and unnecessary**.
- 67. Accordingly, this Court retains full jurisdiction to consider the Petition and grant the writ of habeas corpus.

DETENTION WITHOUT ANY AVAILABLE FORUM FOR REVIEW VIOLATES THE CONSTITUTION

- 68. Respondents' position, taken as a whole, results in the complete elimination of any meaningful avenue for judicial or administrative review of Petitioner's detention.
- 69. Respondents assert that Petitioner is subject to mandatory detention under **8 U.S.C. §1225(b)**.
- 70. Respondents further contend that, under this provision, **Immigration Judges lack jurisdiction to conduct bond hearings or review custody determinations**.
- 71. At the same time, Respondents urge this Court to deny habeas relief and decline intervention in Petitioner's detention.
- 72. The logical consequence of these positions is that no tribunal—administrative or judicial—would have the authority to review the legality of Petitioner's continued confinement.
- 73. Such a result would place Petitioner in a state of **indefinite executive detention without any meaningful opportunity to challenge the legality of that detention**.
- 74. The Constitution does not permit such a framework.
- 75. The **Suspension Clause** protects the writ of habeas corpus as a fundamental safeguard against unlawful detention.

76. The Supreme Court has made clear that the writ must remain “**meaningful and effective**” in all cases involving deprivation of liberty. See **Boumediene v. Bush**, 553 U.S. 723, 779 (2008).
77. Similarly, in **INS v. St. Cyr**, 533 U.S. 289, 301 (2001), the Court emphasized the longstanding presumption in favor of judicial review of executive detention.
78. Even assuming, arguendo, that Respondents’ interpretation of §1225(b) were correct, that interpretation would necessarily foreclose any administrative remedy, as Respondents themselves assert that no bond jurisdiction exists.
79. Under that same framework, if habeas review were also unavailable, Petitioner would be left with **no forum whatsoever to challenge his detention**.
80. The Supreme Court has repeatedly rejected statutory constructions that would eliminate all avenues of review, particularly in cases involving physical liberty.
81. Habeas corpus exists precisely to prevent this type of **unreviewable executive detention**.
82. Respondents’ position therefore not only misapplies the statutory scheme, but also creates a constitutional violation by extinguishing all meaningful review.
83. Where no other forum exists, **this Court’s habeas jurisdiction under 28 U.S.C. §2241 is not only proper, but necessary** to preserve the constitutional structure.
84. Accordingly, the absence of any available avenue for review confirms that continued detention is unlawful and that the writ of habeas corpus must issue.

FIFTH AMENDMENT VIOLATIONS — PROCEDURAL AND SUBSTANTIVE DUE PROCESS

85. The Fifth Amendment prohibits the government from depriving any person of liberty without **due process of law**, and that protection applies fully to Petitioner.
86. Civil immigration detention is constitutionally permissible only so long as it remains **regulatory in nature and reasonably related to its purpose**. See **Zadvydas v. Davis**, 533 U.S. 678, 690 (2001).
87. When detention becomes excessive in relation to that purpose, it ceases to be regulatory and becomes **punitive**, in violation of the Constitution.
88. Procedural due process requires that a detainee be afforded a **meaningful opportunity to challenge continued detention before a neutral decisionmaker**.

89. In evaluating procedural protections, courts apply the balancing framework set forth in **Mathews v. Eldridge**, 424 U.S. 319 (1976).
90. Under **Mathews**, the private interest at stake—physical liberty—is of the highest order.
91. The risk of erroneous deprivation is substantial where detention continues without any individualized review or procedural safeguards.
92. The government’s interest does not justify the continued detention of an individual without meaningful process, particularly where less restrictive alternatives exist.
93. Respondents have not provided Petitioner with any **individualized custody determination**, nor any meaningful opportunity to contest the necessity of his continued detention.
94. This lack of process creates an **unacceptable risk of erroneous deprivation of liberty**.
95. Substantive due process further prohibits detention that is **arbitrary, excessive, or not reasonably related to a legitimate governmental purpose**.
96. The Supreme Court has emphasized that civil detention must bear a reasonable relation to its purpose and may not become indefinite or punitive. See **Zadvydas**, 533 U.S. at 690.
97. Petitioner has now been detained for **approximately 183 days**, far exceeding the brief period contemplated by the Supreme Court in cases such as **Demore v. Kim**, 538 U.S. 510 (2003).
98. The Court in **Demore** upheld detention only in the context of **limited and finite periods**, not prolonged confinement without review.
99. As detention extends in duration, the constitutional justification for continued confinement diminishes.
85. In **Maldonado-Bautista v. Garland**, federal courts recognized that **prolonged immigration detention without an individualized custody determination violates due process** where detention becomes unreasonable in duration.
86. Like the petitioner in **Maldonado-Bautista**, Petitioner here has remained in custody for a prolonged period without any meaningful procedural safeguards.
87. Respondents have not meaningfully addressed this due process violation, nor have they demonstrated that continued detention remains justified under constitutional standards.
88. The continued detention of Petitioner, without individualized review and after a prolonged period of confinement, is **arbitrary and constitutionally impermissible**.

89. Accordingly, Petitioner's detention violates both **procedural and substantive due process**, and the writ of habeas corpus must issue to remedy this unlawful deprivation of liberty.

PROLONGED DETENTION NOW EXCEEDS CONSTITUTIONAL LIMITS

105. Petitioner's continued detention has now reached a duration that exceeds constitutional limits on civil immigration confinement.
106. As of March 18, 2026, Petitioner has been detained for approximately **183 days**, a period that constitutes **prolonged detention under governing constitutional standards**.
107. The Supreme Court has made clear that civil detention must remain **reasonably related to its purpose and limited in duration**. See **Zadvydas v. Davis**, 533 U.S. 678, 699–701 (2001).
108. In **Zadvydas**, the Court recognized that detention beyond six months raises serious constitutional concerns and requires heightened judicial scrutiny.
109. Although **Zadvydas** arose in the post-removal context, its core principle applies broadly: **civil detention cannot continue indefinitely without adequate justification**.
110. The Supreme Court in **Demore v. Kim**, 538 U.S. 510, 529 (2003) upheld detention only on the understanding that it would be **brief and finite in duration**.
111. The Court in **Demore** relied on detention periods that typically lasted **only a few weeks to a few months**, not extended confinement approaching or exceeding six months.
112. Petitioner's detention has now surpassed that limited timeframe and continues without any meaningful procedural safeguard.
113. As detention becomes prolonged, the justification for continued confinement must be **re-evaluated under constitutional standards**.
114. The government bears the burden of demonstrating that continued detention remains **reasonably related to a legitimate purpose**, such as ensuring appearance or protecting the community.
115. Respondents have made no such showing in this case.
116. Respondents have not provided individualized evidence that Petitioner poses a danger or flight risk sufficient to justify continued detention.

117. Instead, Respondents rely solely on a **categorical statutory framework**, without regard to the length of detention or Petitioner's individual circumstances.
118. That approach is inconsistent with the Constitution, which requires that civil detention remain **non-punitive and reasonably limited in duration**.
119. Petitioner's continued confinement, now extending beyond six months, has become **excessive and unreasonable** in relation to any legitimate governmental purpose.
120. The failure to provide any mechanism for review during this prolonged period further exacerbates the constitutional violation.
121. Accordingly, Petitioner's detention has crossed the line from permissible regulatory detention into **unlawful and unconstitutional confinement**.
122. The Court must therefore intervene and grant the writ of habeas corpus to remedy this ongoing violation of Petitioner's liberty.

ADMINISTRATIVE PROCEDURE ACT VIOLATIONS

123. Respondents' continued detention of Petitioner under **8 U.S.C. §1225(b)** is also unlawful under the **Administrative Procedure Act, 5 U.S.C. §706(2)(A)**, because it rests on an arbitrary, capricious, and legally unsupported application of the detention statutes.
124. Agency action is unlawful where it departs from established practice without a reasoned explanation, disregards important aspects of the problem, or applies the law in a manner contrary to the statutory scheme.
125. Here, Respondents rely on a detention theory that treats Petitioner as though he were an arriving alien seeking admission, despite his long-term residence in the interior of the United States.
126. That position reflects a significant departure from the longstanding framework under which noncitizens apprehended within the interior after entry were generally detained under **8 U.S.C. §1226(a)** rather than **8 U.S.C. §1225(b)**.
127. Respondents have offered no reasoned basis for applying a border-arrival detention theory to Petitioner's circumstances.
128. Respondents have not produced evidence that Petitioner was apprehended at the border, presented himself for inspection, or otherwise falls within the class of persons historically governed by **§1225(b)**.

129. Instead, Respondents rely on a categorical interpretation untethered to the actual facts of Petitioner's case.
130. Agency action is arbitrary and capricious when it ignores material facts that undermine the agency's chosen legal conclusion.
131. Respondents also fail to address the serious reliance and fairness concerns raised by retroactively applying an expanded detention theory to a person who had long been residing in the United States prior to detention.
132. The absence of a reasoned explanation is especially significant where the challenged agency action results in **physical confinement and deprivation of liberty**.
133. Respondents further failed to meaningfully respond to Petitioner's APA argument in the original Petition, instead assuming the validity of the very detention framework being challenged.
134. That omission confirms that Respondents have not justified the agency's departure from the traditional distinction between border applicants for admission and long-term interior detainees.
135. The APA does not permit the government to impose mandatory detention through an unsupported and unexplained expansion of statutory language.
136. Because Respondents' detention theory is unsupported by the record, inconsistent with longstanding practice, and insufficiently explained, it is **arbitrary, capricious, and contrary to law**.
137. Accordingly, the continued detention of Petitioner under this misapplied statutory framework is unlawful, and the writ of habeas corpus should issue.

HABEAS CORPUS REQUIRES IMMEDIATE JUDICIAL ACTION UNDER 28 U.S.C.

§2243

138. The writ of habeas corpus is designed to provide a **swift and imperative remedy in all cases of illegal restraint or confinement**, and its purpose is defeated when courts permit unlawful detention to continue without prompt review. See **Fay v. Noia, 372 U.S. 391, 400 (1963)**.

139. Congress codified this principle in 28 U.S.C. §2243, which requires courts to act expeditiously in resolving habeas petitions and to **“summarily hear and determine the facts, and dispose of the matter as law and justice require.”**
140. The statute further contemplates that a respondent’s return be filed promptly and that the court proceed without unnecessary delay.
141. In this case, Petitioner filed his habeas petition seeking immediate judicial review of his detention, yet the procedural safeguards contemplated by §2243 have not been meaningfully enforced.
142. The Court did not issue an Order to Show Cause within the expedited timeframe requested, and the matter has instead proceeded under standard civil timelines inconsistent with the urgent nature of habeas relief.
143. Respondents have now filed their response, and the issues are fully briefed and ripe for adjudication.
144. There are no remaining factual disputes that would justify further delay.
145. Petitioner’s detention has now extended to approximately **183 days**, well beyond the period contemplated for brief civil detention.
146. Continued delay in adjudicating this Petition effectively converts habeas corpus into a **prolonged process rather than a swift remedy**, contrary to its constitutional purpose.
147. Courts have repeatedly emphasized that habeas relief must not be undermined by procedural delay where an individual’s liberty is at stake.
148. Where, as here, the legality of detention presents a **pure question of law**, the Court is empowered to act without further proceedings.
149. The record is complete, the legal issues have been presented, and Respondents have failed to justify the continued deprivation of Petitioner’s liberty.
150. Under these circumstances, the Court has both the authority and the obligation to **resolve the Petition without further delay**.
151. Any additional waiting period would perpetuate an ongoing constitutional violation and undermine the fundamental protections guaranteed by the writ of habeas corpus.
152. Accordingly, Petitioner respectfully requests that this Court **immediately rule on the Petition and grant the writ**, ordering his release from unlawful detention.

**THIS CASE PRESENTS PURELY LEGAL QUESTIONS SUITABLE FOR SUMMARY
DISPOSITION**

153. This case presents a purely legal question: whether Respondents may lawfully detain Petitioner under **8 U.S.C. §1225(b)** despite his long-term presence within the United States and without providing any meaningful review of that detention.
154. There are no material facts in dispute that would require further evidentiary development.
155. The central issues—statutory classification, constitutional limits on detention, and the availability of habeas review—are questions of law appropriate for immediate judicial resolution.
156. The Supreme Court has recognized that habeas corpus proceedings are designed to permit courts to resolve the legality of detention **summarily where the facts are not in dispute**. See **Preiser v. Rodriguez**, 411 U.S. 475, 500 (1973).
157. Here, Respondents have not introduced any evidence creating a factual dispute regarding Petitioner’s manner of entry or the circumstances of his detention.
158. Respondents have not produced any **record of entry, inspection documentation, or biometric evidence** demonstrating that Petitioner was apprehended at or near the border.
159. Instead, Respondents rely on legal conclusions and statutory interpretation, confirming that the dispute is **purely legal in nature**.
160. The absence of factual development is particularly significant because the government bears the burden of establishing that mandatory detention under **§1225(b)** applies.
161. Where the government fails to present evidence supporting its classification, there is no factual issue for the Court to resolve.
162. The record, as it stands, is complete and sufficient for the Court to determine the legality of Petitioner’s detention.
163. Under **28 U.S.C. §2243**, the Court is empowered to **summarily hear and determine the matter** and dispose of the case as law and justice require.
164. Because this case involves no disputed facts and presents only legal questions, further delay or additional proceedings are unnecessary.
165. The Court may therefore resolve this Petition on the existing record and grant appropriate relief without the need for a hearing.

166. Accordingly, this case is ripe for **immediate adjudication**, and the Court should proceed to determine the legality of Petitioner's detention without further delay.

**RESPONDENTS' DETENTION THEORY IS LEGALLY AND FACTUALLY
UNSUPPORTED**

167. Respondents' detention theory rests on the assertion that Petitioner is properly classified under **8 U.S.C. §1225(b)** as an arriving alien subject to mandatory detention.
168. That assertion is unsupported by both the factual record and the governing statutory framework.
169. The government bears the burden of establishing that mandatory detention applies.
170. Respondents have failed to meet that burden.
171. Respondents have not produced any evidence demonstrating that Petitioner was apprehended at or near the border.
172. Respondents have not provided any **record of entry, inspection documentation, or biometric evidence** linking Petitioner to a border encounter.
173. Respondents have not shown that Petitioner presented himself for admission at a port of entry or was processed as an arriving alien.
174. Instead, the undisputed facts reflect that Petitioner has resided within the United States for over two decades and was living in the interior of the country at the time of his detention.
175. In the absence of evidence supporting a border-based classification, Respondents rely solely on conclusory assertions that Petitioner falls within **§1225(b)**.
176. Conclusory assertions are insufficient to justify the deprivation of liberty.
177. The statutory distinction between **§1225** and **§1226** cannot be disregarded through unsupported legal conclusions.
178. Respondents' position effectively collapses that distinction by treating all noncitizens who entered without inspection as arriving aliens, regardless of their length of residence or circumstances of apprehension.
179. Such an interpretation is inconsistent with the text, structure, and purpose of the Immigration and Nationality Act.
180. It also permits the government to impose mandatory detention without first establishing the factual predicate required by the statute.

181. The absence of evidence is particularly significant in a case involving prolonged detention, where the government must justify continued confinement with more than categorical assertions.
182. Respondents' failure to produce evidence confirming Petitioner's classification renders their detention theory legally and factually deficient.
183. Because Respondents have not established that §1225(b) applies, they have failed to justify Petitioner's continued detention.
184. Accordingly, the Court should reject Respondents' unsupported detention theory and grant the writ of habeas corpus.

**EVEN ACCEPTING RESPONDENTS' THEORY, DETENTION REMAINS
UNLAWFUL**

185. Even assuming, arguendo, that Respondents' interpretation of 8 U.S.C. §1225(b) is correct, Petitioner's continued detention would still be unlawful.
186. Under Respondents' own framework, individuals detained under §1225(b) are not entitled to a bond hearing before an Immigration Judge.
187. Respondents further maintain that Immigration Judges lack jurisdiction to review custody determinations in such cases.
188. At the same time, Respondents urge this Court to deny habeas relief and decline to intervene in Petitioner's detention.
189. Taken together, these positions eliminate any meaningful mechanism through which Petitioner can challenge the legality of his continued confinement.
190. Under Respondents' theory, Petitioner would have no access to a bond hearing, no administrative review, and no effective judicial remedy.
191. Such a framework would result in **indefinite detention without any available avenue for relief**, which is incompatible with the Constitution.
192. The Supreme Court has consistently rejected interpretations of statutes that would eliminate all meaningful review of executive detention. See **INS v. St. Cyr**, 533 U.S. 289 (2001); **Boumediene v. Bush**, 553 U.S. 723 (2008).
193. Habeas corpus exists precisely to prevent situations in which an individual is deprived of liberty without any forum to test the legality of that detention.

194. Where all other avenues are foreclosed, the writ of habeas corpus serves as the **essential safeguard against unlawful confinement**.
195. Respondents' position, even if accepted, confirms that habeas review is not only appropriate, but necessary in this case.
196. The Constitution does not permit the government to create a system in which an individual may be detained indefinitely without access to any meaningful review.
197. Accordingly, even under Respondents' own theory, Petitioner's continued detention is unlawful, and the writ of habeas corpus must issue.

UNCONTESTED AUTHORITY AND DEVELOPMENTS SUPPORT RELIEF

198. Respondents did not meaningfully rebut Petitioner's reliance on **Maldonado-Bautista v. Garland**, which recognizes that prolonged immigration detention without adequate procedural safeguards violates due process.
199. The failure to address **Maldonado-Bautista** is significant because it directly applies to the core issue in this case—continued detention without individualized review after an extended period of confinement.
200. Where a party fails to respond to a material legal argument, courts may treat that argument as conceded.
201. Respondents' silence on this authority underscores the absence of a viable legal justification for Petitioner's continued detention.
202. In addition, recent developments in federal litigation have further recognized that certain detainees may be **misclassified under 8 U.S.C. §1225(b)** and unlawfully subjected to mandatory detention.
203. Federal court filings, including class-based proceedings, have acknowledged that individuals detained under this framework may, in fact, be entitled to custody determinations under **8 U.S.C. §1226(a)** due to improper classification.
204. These developments reinforce the legal and factual concerns raised in this case regarding the government's reliance on an unsupported detention theory.

- 205. While not binding on this Court, such developments reflect a growing recognition that the government's application of **§1225(b)** in interior detention cases raises serious constitutional and statutory issues.
- 206. Respondents have not addressed these concerns or provided any authority demonstrating that their interpretation withstands constitutional scrutiny.
- 207. The absence of a meaningful response to both **Maldonado-Bautista** and these broader developments further confirms that Respondents' position lacks support.
- 208. Taken together, the uncontested authority and emerging legal landscape support the conclusion that Petitioner's continued detention is unlawful.
- 209. Accordingly, this Court should grant the writ of habeas corpus and order Petitioner's immediate release.

FINAL CLOSE

- 210. For all the foregoing reasons, Petitioner respectfully submits that his continued detention is unlawful under the Constitution and laws of the United States.
- 211. Respondents have failed to justify Petitioner's detention under **8 U.S.C. §1225(b)**, have failed to meet their burden of proof, and have failed to rebut multiple independent grounds for relief presented in the Petition.
- 212. Respondents were afforded a full and fair opportunity to respond to the Petition and to submit evidence supporting their detention theory.
- 213. Despite that opportunity, Respondents failed to produce any **record of entry, inspection documentation, biometric evidence, or other proof** establishing that Petitioner was apprehended at or near the border or properly classified under **§1225(b)**.
- 214. Respondents' failure to produce such evidence confirms that they did not meet their burden to justify mandatory detention.
- 215. The record is now complete.
- 216. There are no remaining factual disputes requiring further development, and no additional briefing from Respondents is necessary.
- 217. The issues before the Court are purely legal and fully presented for adjudication.
- 218. Under these circumstances, further delay would serve no purpose and would only prolong an unlawful deprivation of liberty.

219. The Supreme Court has emphasized that habeas corpus is intended to provide a **swift and imperative remedy** in cases of unlawful detention. See **Fay v. Noia**, 372 U.S. 391, 400 (1963).
220. Consistent with **28 U.S.C. §2243**, this Court is obligated to **summarily hear and determine the matter** and dispose of it as law and justice require.
221. Because the record is complete and Respondents have already presented their position, there is no procedural or factual basis for further delay.
222. This case is ripe for immediate adjudication.
223. Petitioner has now endured prolonged detention without meaningful review, in violation of the **Due Process Clause of the Fifth Amendment** and the fundamental protections guaranteed by the writ of habeas corpus.
224. Accordingly, the Court should act now and resolve the legality of Petitioner's detention without further delay.

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court grant the following relief:

- a. Issue the writ of habeas corpus pursuant to **28 U.S.C. §2241**;
- b. Declare that Petitioner's continued detention violates the **Constitution and laws of the United States**, including the **Due Process Clause of the Fifth Amendment**;
- c. Declare that Respondents have failed to meet their burden to justify Petitioner's detention under **8 U.S.C. §1225(b)**;
- d. Order Petitioner's **immediate release from immigration detention**, without further delay;
- e. Pursuant to **28 U.S.C. §2243**, summarily determine this matter and dispose of it as law and justice require;
- f. Pursuant to the **All Writs Act, 28 U.S.C. §1651(a)**, enter an order preserving this Court's jurisdiction, including prohibiting Respondents from transferring Petitioner outside this Court's jurisdiction while this matter is pending;
- g. Pursuant to the **All Writs Act, 28 U.S.C. §1651(a)**, enjoin Respondents from executing any removal or deportation of Petitioner while this habeas action remains pending;

- h. Prohibit Respondents from re-detaining Petitioner under the same unsupported statutory classification absent lawful justification;
- i. Grant such other and further relief as this Court deems just and proper.

VERIFICATION

I, Isidro Campos Padilla, hereby declare under penalty of perjury pursuant to 28 U.S.C. §1746 that I am the Petitioner in the above-entitled action, that I have read the foregoing Petitioner's Reply in Support of Habeas Corpus and Request for Immediate Adjudication, and that the facts stated therein are true and correct to the best of my knowledge, information, and belief.

Executed on this 18 day of March, 2026.

Isidro Campos P
Isidro Campos Padilla
A-Number: 

South Texas ICE Processing Center
566 Veterans Drive
Pearsall, Texas 78061