UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil No. 0:26-cv-00395-ECT-DTS

FULGENCIO SALAZAR BONILLA,

Petitioner,

v.

TODD LYONS PAMELA BONDI, *et al.*,

Respondents.

FEDERAL RESPONDENTS' RESPONSE TO PETITION FOR WRIT OF HABEAS CORPUS

This is a duplicate and second-filed habeas action. Petitioner Fulgencio Salazar Bonilla has already filed a petition for a writ of habeas corpus seeking a bond hearing in connection with Petitioner's detention by the U.S. Immigration and Customs Enforcement. *See Salazar Bonilla v. Bond*, No. 26-cv-360-NEB-DJF (D. Minn. filed Jan. 15, 2026). And that petition was filed the day before the petition in this case was filed. The Federal Respondents filed a response in the earlier case yesterday and therefore respectfully request that this action be dismissed as duplicative. *See, e.g., Evangelista v. Fed. Bureau of Prisons*, 2025 U.S. Dist. LEXIS 104732, at *6 (D. Minn. June 3, 2025) ("Federal courts have an 'inherent power' to dismiss duplicative claims to conserve judicial resources and protect defendants from piecemeal, vexatious suits."), *adopted by* 2025 U.S. Dist. LEXIS 140480 (D. Minn. July 23, 2025).[1]

[1] Based on correspondence with Petitioner's counsel over the last two days, the Federal Respondents understood that Petitioner planned to seek consolidation of the two actions. But no such request for consolidation has been filed as of the time of this response.

To the extent this Court wants to proceed with adjudicating Petitioner's duplicate action, the Federal Respondents acknowledge that the petition raises legal and factual issues similar to those in prior habeas petitions this Court has decided. *See* Dkt. 3, at 2. These issues are before the Eighth Circuit on expedited review in *Avila v. Bondi*, No. 25-3248 (8th Cir. docketed Nov. 10, 2025). For purposes of expediting these proceedings, the Federal Respondents assert all arguments raised by the government in *Avila*, preserve those arguments for any appeal in this case, and respectfully request that the Court deny Petitioner's habeas petition.

Dated: January 19, 2026

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