

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

GLADIS EUGENIA ALVAREZ DE LEON DE XEC

Civ. No. DLB-26-277

Petitioner,

v.

WARDEN, BALTIMORE ICE DETENTION, et al.

Respondents

PETITIONER'S RESPONSE TO RESPONDENT'S STATUS REPORT

Petitioner, by and through undersigned counsel, Abhishek Jhamb, hereby submits the following Response to Respondent's Status Report:

1. Respondents in its Status Report, have clearly ignored the material fact that the Petitioner was paroled into the USA by U.S. Immigration and Customs Enforcement (ICE). This fact was explicitly stated in the Habeas Petition filed before this Honorable Court.
2. The Matter of Q. LI states that "*An alien detained under section 235(b) of the INA, 8 U.S.C. § 1225(b), who is released from detention pursuant to a grant of parole under section 212(d)(5)(A) of the INA, 8 U.S.C. § 1182(d)(5)(A) (2018), and whose grant of parole is subsequently terminated, is returned to custody under section 235(b) **pending the completion of removal proceedings.***"
3. Here, the removal proceedings are no longer pending because the Petitioner was granted Voluntary Departure by the Immigration Judge (IJ) on February 23, 2026. Please see the order of IJ attached herewith.

4. Because the removal proceedings have concluded with the grant of Voluntary Departure, Petitioner's continued detention under section 235(b)—namely, detention “pending the completion of removal proceedings”—no longer exists. Accordingly, Respondents lack lawful authority to continue detaining the Petitioner under that provision.
5. Therefore, in light of the fact that (1) Petitioner was paroled into the United States, and (2) removal proceedings have concluded with the grant of Voluntary Departure, Petitioner respectfully requests that this Honorable Court grant appropriate relief, including ordering Petitioner's immediate release from ICE custody.

Date: February 25, 2026

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of February, 2026, a copy of foregoing Response was served electronically on all parties and counsel receiving service via CM/ECF in this case.

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