

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Arnoldo Luis Sanchez

CASE NO.: 0:26-cv-60181-EA

Petitioner,

vs.

Miami Field Office Director, Immigration  
and Customs Enforcement and Removal  
Operations ("ICE/ERO"), et al

Respondent,  
\_\_\_\_\_ /

**PETITIONER'S REPLY TO RESPONDENT'S RESPONSE TO COURT'S  
ORDER REGARDING JURISDICTION**

COMES NOW, Petitioner Arnoldo Luis Sanchez, by and through the undersigned counsel, and respectfully files this Reply to Respondent's Response to Court's Order Regarding Jurisdiction, filed on February 23, 2026, and states as follows:

As previously argued in the Petitioner's Petition for Writ of Habeas Corpus (D.E. #1) and Petitioner's Brief in Support of Subject Matter Jurisdiction (D.E. #4), the Petitioner respectfully reasserts and incorporates the arguments in the Petitioner's Petition and Brief showing the Court has subject matter jurisdiction over the Petition for Writ of Habeas Corpus and the relief sought therein.

Petitioner respectfully reasserts that the Court has subject matter jurisdiction over this matter under 8 U.S.C. §1252(b)(9) and 8 U.S.C. §1252(g) because neither statute bar the Court from having subject matter jurisdiction over Petitioner's claims.

Additionally, 8 U.S.C. §1252(b)(9) does not divest the Court of subject matter jurisdiction over the Petition and the relief sought therein pursuant to *Jennings, v. Rodriguez*, 583 U.S. 281, 292–294 (2018). 8 U.S.C. §1252(g) also does not bar this Court's review of Petitioner's claims because the relief sought in the Petition does not arise from the decision or action by the Attorney General to commence proceedings, adjudicate cases, or execute removal orders against any alien, but rather the legality of his detention.

Therefore, based on the caselaw and analysis cited in the Petitioner's Petition and Brief, this Court has jurisdiction to review and adjudicate the claims and relief sought in the Petition.

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 23, 2026, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a Notice of Electronic Filing to all parties of record.

/s/ Allison Rub, Esq.  
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