

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

Anzoni Quezada-Barajas,

Petitioner,

v.

Pamela Bondi, Attorney General,

Kristi Noem, Secretary, U.S. Department of  
Homeland Security,

Todd M. Lyons, Acting Director of  
Immigration and Customs Enforcement,

Marisa Flores, Director, El Paso Field Office  
Immigration and Customs Enforcement, and

Curtis Taylor, Major General, U.S. Army at  
Camp Bliss.

Respondents.

Case No. 26-166

**REPLY IN SUPPORT OF  
PETITION FOR WRIT OF  
HABEAS CORPUS**

Expedited Handling Requested

Petitioner Anzoni Quezada-Barajas submits the following Reply in Support of  
Petition for Writ of Habeas Corpus:

1. Respondents' Response to Habeas Petition and Request to Proceed Without Oral Argument fails to identify any lawful reason for Petitioner's detention.
2. Respondents concede that the facts of this case do not materially differ from those underlying the Court's prior holdings that 8 U.S.C. § 1225(b)(2) does not support mandatory detention. Dkt. 3 at 3-4 ("There are no material factual differences

and the common question of law between this case and those rulings, would control the result in this case should this Court follow its legal reasoning in its prior decisions.”).

3. Accordingly, this Court should grant Petitioner a writ of habeas corpus and order his immediate release.

4. Counsel and Petitioner recognize that the Court and its staff are inundated by similar habeas petitions and are very grateful for the expeditious work of all involved.

5. Petitioner respectfully requests the following specific relief to ensure Petitioner’s safe return home, including release (1) with all of his personal effects, such as driver’s license, passport, immigration documents, keys, and cell phone; (2) without conditions such as worn GPS tracking devices, telephonic tracking, or use of the SmartLINK app; (3) with notification to the undersigned counsel of a street address at which Petitioner will be released within twenty four hours of his release; and (4) with notification of the undersigned counsel of a two-hour window in which Petitioner will be released so that arrangements can be made to pick Petitioner up from the street address noticed. Petitioner additionally requests specific relief to require Respondents to certify, in writing, within 48 hours of this Court’s Order that all aspects of the Order have been complied with, and to enjoin Respondents from re-detaining Petitioner under the same statutory authority.

Date: February 3, 2026

*s/ Rachel Scobie*

Rachel Scobie, #314171

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*Attorney for Petitioner*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd day of February 2026, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

*s/ Rachel Scobie*  
Rachel Scobie