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8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 Wilbert Prado-Cegueda,
11 Petitioner,

) Case No. '26CV0481 LL MSB

12 v.

13 PAM BONDI, Attorney General of the)
14 United States, in her official capacity;)
15 KRISTI NOEM, Secretary of the U.S.)
16 Department of Homeland Security, in her)
17 official capacity; EXECUTIVE OFFICE)
18 FOR IMMIGRATION REVIEW; TODD)
19 LYONS, Acting Director of U.S.)
20 Immigration and Customs Enforcement,)
21 in his official capacity; PATRICK)
22 DIVVER, ICE Field Office Director for)
23 San Diego County, in his official capacity;)
24 WARDEN OF OTAY MESA)
25 DETENTION CENTER.)

) PETITION FOR WRIT OF
) HABEAS CORPUS PURSUANT TO
) 28 USC §2241

26 Respondents.

27 **INTRODUCTION**

28 1. This case challenges the unlawful re-detention of Wilbert Prado Cegueda,

1 who entered the United States in 2013 to seek asylum. Shortly after his entry, he
2 was released and subsequently filed his asylum application.

3
4 2. In the time since his release, Mr. Prado faithfully complied with the
5 check-in requirements imposed by Immigration and Customs Enforcement (ICE)
6 as part of his release.

7 3. Mr. Cegueda attended all immigration court hearings and was granted
8 Withholding of Removal on November 10, 2021.

9
10 4. For the past 10 plus years, Mr. Prado has continued to comply with all
11 conditions of release. Despite this, petitioner was unlawfully re-detained on
12 October 16, 2025, during a scheduled ISAP appointment. Mr. Prado was
13 transferred to the Otay Mesa Detention Facility in San Diego, California where he
14 remains detained today.

15
16 5. Before re-detaining him, Respondents did not provide Mr. Prado with
17 any written notice explaining the basis for the revocation of his release. Likewise,
18 Respondents did not assess whether Petitioner presented a flight risk or danger to
19 the community prior to their re-arrests. Nor did Respondents provide a hearing
20 before a neutral decision maker where ICE was required to justify the basis for re-
21 detention or explain why Mr. Prado is a flight risk or danger to the community.

22
23 6. As this Court recently held, due process demands such a hearing prior to
24 the government's decision to terminate a person's liberty. *See E.A.T.B. v. Wansley*,
25 ---F. Supp. 3d --- No. C25-1192-KKE, 2025 WL 2402130, at *2-6 (W.D. Wash.
26 Aug. 19, 2025); *Ramirez Tesara v. Wamsley*, --- F.Supp. 3d ---, No. 2:25-CV-
27 01723-MJP-TLF, 2025 WL 2637663, at *2-4 (W.D. Wash. Sept. 12, 2025);

28 Ledesma

1 7. By failing to provide such a hearing, Respondents have violated Mr.
2 Prado's constitutional right to due process.

3 8. Accordingly, this Court should grant the instant petition for a writ of
4 habeas corpus and order his immediate release. *See id.* at 6 (ordering immediate
5 release because "a post-deprivation hearing cannot serve as an adequate procedural
6 safeguard because it is after the fact and cannot prevent an erroneous deprivation
7 of liberty").
8

9 JURISDICTION AND VENUE

10 9. This action arises under the Constitution of the United States and the
11 Immigration and Nationality Act (INA), 8 U.S.C. § 1101 et seq.

12 10. This Court has jurisdiction under 28 U.S.C. §§ 2241 and 1331. The
13 Suspension Clause protects habeas review of civil immigration detention. See U.S.
14 Const. art. I, § 9, cl. 2.
15

16 11. Venue properly lies in the Southern District of California under 28
17 U.S.C. § 1391(e)(1)–(2). Petitioner was arrested in this District, the Immigration
18 Judge conducted bond proceedings here, and the ICE Field Office Director
19 responsible for Petitioner's custody resides in this District.
20

21 12. Petitioner is presently housed at the Otay Mesa detention facility in San
22 Diego, California. Should DHS transfer Petitioner outside the District prior to
23 filing this Petition, such transfer would not divest this Court of venue where the
24 petition challenges systemic DHS and ICE policies and seeks relief that only those
25 Respondents, not the immediate facility warden, can provide. See *Rumsfeld v.*
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1 *Padilla*, 542 U.S. 426, 436 n.8 (2004) (recognizing exceptions to the immediate-
2 custodian rule). Because the petition challenges DHS and ICE policies governing
3 bond eligibility, relief runs against higher-level officials and agencies located in
4 this District, not solely the immediate custodian.
5

6
7 13. The Court may grant declaratory and injunctive relief under 28 U.S.C.
8 §§ 2201–2202 and the APA, 5 U.S.C. § 702, to the extent necessary.
9

10 **REQUIREMENTS OF 28 U.S.C. § 2243**

11 14. The Court must grant the petition for writ of habeas corpus or issue an
12 order to show cause (OSC) to the Respondents “forthwith,” unless Petitioner is not
13 entitled to relief. 28 U.S.C. § 2243. If an OSC is issued, the Court must require
14 Respondents to file a return “within three days unless for good cause additional
15 time, not exceeding twenty days, is allowed.” *Id.*
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18 13. Habeas corpus is “perhaps the most important writ known to the
19 constitutional law . . . affording as it does a swift and imperative remedy in all
20 cases of illegal restraint or confinement.” *Fay v. Noia*, 372 U.S. 391, 400 (1963).
21 “The application for the writ usurps the attention and displaces the calendar of the
22 judge or justice who entertains it and receives prompt action from him within the
23 four corners of the application.” *Yong v. I.N.S.*, 208 F.3d 1116, 1120 (9th Cir.
24 2000) (citation omitted); see also *Van Buskirk v. Wilkinson*, 216 F.2d 735, 737–38
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1 (9th Cir. 1954) (Habeas corpus is “a speedy remedy, entitled by statute to special,
2 preferential consideration to insure expeditious hearing and determination.”).
3

4 14. Mr. Prado is “in custody” for the purpose of 28 U.S.C. § 2241 because
5 he is in Respondents’ custody at Otay Mesa Detention Facility.
6

7 PARTIES

8 15. Petitioner Wilbert Prado-Cegueda is a native and citizen of Mexico who
9 has resided continuously in California since 2015. He was arrested in this District
10 on October 16, 2025, following his scheduled appearance for an ISAP appointment
11 and remains detained in ICE custody
12

13 16. Respondent Pam Bondi is the Attorney General of the United States and
14 is sued in her official capacity as the head of the Department of Justice.
15

16 17. The Attorney General is responsible for the fair administration of the
17 laws of the United States.

18 18. Kristi Noem, Secretary of the U.S. Department of Homeland Security
19 (DHS), is sued in her official capacity as the Cabinet official charged with
20 administration and enforcement of the immigration laws, including custody and
21 release authority. *See* 8 U.S.C. § 1103(a).
22

23 19. Respondent Executive Office for Immigration Review is a component
24 agency of the Department of Justice responsible for conducting removal and bond
25 hearings of noncitizens. EOIR is comprised of a lower adjudicatory body
26 administered by immigration judges and an appellate body known as the Board of
27 Immigration Appeal (BIA). Immigration judges issue bond redetermination
28

1 hearing decisions, which are then subject to appeal to the BIA. EOIR is sued as an
2 agency respondent because its policies and decisions are at issue in this action.

3
4 20. Respondent Todd Lyons is the Acting Director of U.S. Immigration
5 and Customs Enforcement (ICE) and is sued in his official capacity. ICE is
6 responsible for the detention of Petitioners.

7
8 21. Patrick Divver is the Immigration and Customs Enforcement Field
9 Office Director for San Diego County, including the Otay Mesa detention facility
10 and is sued in his official capacity.

11 **LEGAL FRAMEWORK**

12 22. Due process requires that if DHS seeks to re-arrest a person like Mr.
13 Prado, individuals who have lived in the United States without incident after DHS
14 first released them, submitted applications for protection from removal, and
15 otherwise complied with the terms of their releases – the government must afford a
16 hearing before a neutral decisionmaker to determine whether any re-detention is
17 justified, and whether the person is a flight risk or danger to the community.

18
19 23. “Freedom from imprisonment, from government custody, detention, or
20 other forms of physical restraint, lies at the heart of the liberty protected by the
21 Due Process Clause.” *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001). As Courts
22 recently recognized, this is the “the most elemental of liberty interests.” *E.A. T.-B.*,
23 2025 WL 2402130, at *3 (citation modified).

24
25 24. Consistent with this principle, individuals released on parole or other
26 forms of conditional release have a liberty interest in their “continued liberty.”
27 *Morrissey v. Brewer*, 408 U.S. 471, 482 (1972).

28 25. Such liberty is protected by the Fifth Amendment because, “although

1 indeterminate, [it] includes many of the core values of unqualified liberty,” such as
2 the ability to be gainfully employed and live with family, “and its termination
3 inflicts a ‘grievous loss’ on the [released individual] and often on others.” *Id.*
4

5 26. To guarantee against arbitrary re-detention and to guarantee the right to
6 liberty, due process requires “adequate procedural protections” that test whether
7 the government’s asserted justification for a noncitizen’s physical confinement
8 “outweighs the individual’s constitutionally protected interest in avoiding physical
9 restraint.” *Zadvydas*, 533 U.S. at 690 (citation modified).
10

11 27. Due process thus guarantees notice and an individualized hearing before
12 a neutral decisionmaker to assess danger or flight risk before the revocation of an
13 individual’s release. *Goldberg v. Kelly*, 397 U.S. 254, 267 (1970) (“The
14 fundamental requisite of due process of law is the opportunity to be heard . . . at a
15 meaningful time in a meaningful manner.” (citation modified)); see also, e.g.,
16 *Morrissey*, 408 U.S. at 485 (requiring “preliminary hearing to determine whether
17 there is probable cause or reasonable ground to believe that the arrested parolee has
18 committed . . . a violation of parole conditions” and that such determination be
19 made “by someone not directly involved in the case” (citation modified)).
20

21 28. Several courts, including this one, have recognized that these principles
22 apply with respect to the re-detention of the many noncitizens that DHS has
23 recently begun taking back into custody, often after such persons have been
24 released for months and years.
25

26 29. For example, in *E.A. T.-B.*, this Court applied the *Mathews v. Eldridge*,
27 424 U.S. 319 (1976), framework to hold that even in a case where the government
28 argued mandatory detention applied, a person’s re-detention required a hearing.

1 The Court did the same in *Ramirez Tesara, Kumar, and Ledesma Gonzalez*. See
2 *Ramirez Tesara*, 2025 WL 2637663, at *2–3; *Kumar*, 2025 WL 2677089, at *2–3;
3 *Ledesma Gonzalez*, 2025 WL 2841574, at *7–8.
4

5 30. In applying the three *Mathews* factors, the E.A.T.-B. court held that the
6 Petitioner had “undoubtedly [been] deprive[d] . . . of an established interest in his
7 liberty,” *E.A. T.-B.*, 2025 WL 2402130, at *3, which, as noted, “is the most
8 elemental of liberty interests,” *id.* (citation modified). The Court further explained
9 that even if detention was mandatory, the risk of erroneous deprivation of liberty
10 without a hearing was high because a hearing serves to ensure that the purposes of
11 detention—the prevention of danger and flight risk—are properly served. *Id.* at *4–
12 5. Finally, the Court explained that “the Government’s interest in re-detaining non-
13 citizens previously released without a hearing is low: although it would have
14 required the expenditure of finite resources (money and time) to provide Petitioner
15 notice and hearing on [ISAP] violations before arresting and re-detaining him,
16 those costs are far outweighed by the risk of erroneous deprivation of the liberty
17 interest at issue.” *Id.* at *5. As a result, this Court ordered the petitioner’s
18 immediate release. *Id.* at *6.
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21

22 31. This Court applied a similar analysis in *Ramirez Tesara*. There, the Court
23 reasoned that the petitioner had a “weighty” interest in his liberty and was entitled
24 to the “full protections of the due process clause.” 2025 WL 2637663, at *3. When
25 examining the value of additional safeguards, the Court also noted that despite the
26 government’s allegations of ISAP violations, “the fact ‘that the Government may
27 believe it has a valid reason to detain Petitioner does not eliminate its obligation to
28 effectuate the detention in a manner that comports with due process.’” *Id.* at *4

1 (quoting *E.A. T.-B.*, 2025 WL 2402130, at *4). Finally, the Court reasoned that any
2 government interest in re-detention without a hearing was “minimal.” *Id.*
3 Accordingly, there too, the Court ordered the petitioner’s immediate release. *Id.* at
4 *5.
5

6 32. The *Kumar* and *Ledesma Gonzalez* courts reached the same decision,
7 again holding that all three factors weighed in favor of affording the petitioner a
8 bond hearing. 2025 WL 2677089, at *3–4; 2025 WL 2841574, at *7–9; *see also*
9 Report & Recommendation, *Lopez Reyes*, No. 2:25-cv-01868-JLR-MLP (W.D.
10 Wash. Oct. 15, 2025), Dkt. 13 (same).
11

12 33. The Court’s decision in *E.A. T.-B.* is consistent with many other district
13 court decisions addressing similar situations. *See, e.g., Valdez v. Joyce*, No. 25
14 CIV. 4627 (GBD), (S.D.N.Y. June 18, 2025) (ordering immediate release due to
15 lack of predeprivation hearing); *Pinchi v. Noem*, --- F. Supp. 3d ---, No. 5:25-CV-
16 05632-PCP, 2025 WL 2084921 (N.D. Cal. July 24, 2025) (similar); *Maklad v.*
17 *Murray*, No. 1:25-CV-00946 JLT SAB, 2025 WL 2299376 (E.D. Cal. Aug. 8,
18 2025) (similar); *Garcia v. Andrews*, No. 1:25-CV-01006 JLT SAB, 2025 WL
19 2420068 (E.D. Cal. Aug. 21, 2025) (similar).
20

21 34. The same framework and principles apply here and compel Mr. Prado’s
22 immediate release.
23

24 FACTUAL AND PROCEDURAL BACKGROUND

25 35. Petitioner is a citizen and national of Mexico.
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28

1 36. Petitioner last entered the United States in or about 2013. Removal
2 proceedings ensued. He filed for protection under Withholding of Removal and
3 Convention Against Torture.
4

5 37. Petitioner was released from DHS custody and continued his removal
6 proceedings at the San Diego Immigration Court.

7 38. In 2015, Petitioner was convicted of misdemeanor vehicular
8 manslaughter arising from a traffic accident caused by a failure to yield, which
9 tragically resulted in the death of a motorcyclist. Petitioner completed two hundred
10 hours of community service and continues to make monthly restitution payments.
11 His release is essential to ensure his continued ability to satisfy these restitution
12 obligations. While the incident was tragic, it was accidental in nature and does not
13 render Petitioner a danger to the community. Notably, the offense occurred in 2015
14 and did not preclude Respondent's prior out-of-custody status; he was not deemed
15 a danger to the community at that time and should not be so deemed now.
16
17

18 39. Petitioner attended and complied with all immigration court hearings and
19 conditions of release.

20 40. On or about, November 10, 2021, the San Diego Immigration Court
21 granted Petitioner relief under INA section 241(b)(3) Withholding of Removal.
22

23 41. Petitioner remained at liberty under supervision. Respondent attended all
24 scheduled ISAP appointments and ICE check-ins.

25 42. Petitioner has substantial ties to the community. His partner, Maria
26 Montejo, the mother of his three United States citizen children, is a lawful
27 permanent resident. Their children are ten, seven, and one year old. Respondent's
28

1 presence is critical to providing emotional, financial, and familial support to his
2 young children.

3 43. On or about, October 16, 2025, respondent was unlawfully re-detained
4 during a scheduled ISAP appointment.

5 44. On November 23, 2025, Petitioner was served with an I-229 and Notice
6 to Alien of File Custody Review. Noting the custody status will be reviewed on or
7 about 01/14/2026. A parole request was submitted prior to this date.

8 45. To date, no decision has been provided to Petitioner or Counsel of
9 Record.

10 46. On January 5, 2026, a custody re-determination or bond hearing was
11 heard at the Otay Mesa Immigration Court. The Immigration Judge denied the
12 bond based on DHS's assertion there is no jurisdiction under INA section 241(a).
13 [Detention and removal of aliens ordered removed]

14 47. Petitioner remains detained at the Otay Mesa Detention Center.

15 48. Respondents have not cited a change in circumstance, compliance
16 violations, or the acceptance of a third country for removal.

17 49. More than ninety days have elapsed since the re-detention of Petitioner.

18 50. Accordingly, Respondents' actions violate the Immigration and
19 Nationality Act, and Petitioner is entitled to habeas, declaratory, and injunctive
20 relief.

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22
23
24 **COUNT I**

25 **Violation of Fifth Amendment Right to Due Process**
26 **Procedural Due Process**

27 51. Petitioner repeats, re-alleges, and incorporates by reference each and
28 every allegation in the preceding paragraphs as if fully set forth herein.

1 52. The Fifth Amendment provides that no person shall be deprived of
2 life, liberty, or property without due process of law. U.S. Const. Amend. V.
3 Freedom from imprisonment (from government custody, detention, or other forms
4 of physical restraint) lies at the heart of the liberty that the Clause protects.
5
6 *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001). Noncitizens in removal proceedings
7 possess a fundamental interest in liberty and in being free from unnecessary
8 official restraint.

9 53. Due process does not permit the government to strip Mr. Prado of his
10 liberty without written notice and a hearing before a neutral decision maker to
11 determine whether re-detention is warranted based on danger or flight risk. *See*
12 *Morrissey*, 408 U.S. at 487-88. Such written notice and a hearing must occur *prior*
13 to any re-detention.
14

15 54. Respondents revoked Mr. Prado's release and deprived him of liberty
16 without affording him any written notice or meaningful opportunity to be heard by
17 a neutral decisionmaker prior to his re-detention.
18

19 55. Such continued detention without effectual access to bond violates
20 procedural due process. At a minimum, due process requires that individuals in
21 civil immigration custody receive a bond hearing before a neutral adjudicator, with
22 consideration of ability to pay, alternatives to detention, and with the government
23 bearing the burden of proof by clear and convincing evidence.
24

25 56. Accordingly, Mr. Prado's re-detention violates the Due Process Clause
26 of the Fifth Amendment.
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CLAUSE II
Violation of Due Process Clause of the Fifth Amendment
Unlawful Re-Detention Under INA § 241(a)(6)

57. Petitioner repeats, re-alleges, and incorporates by reference each and every allegation in the preceding paragraphs as if fully set forth herein.

Petitioner repeats, re-alleges, and incorporates by reference each and every allegation in the preceding paragraphs as if fully set forth herein.

58. Petitioner was granted Withholding of Removal to Mexico on November 10, 2021. Which allows petitioner to remain and work in the U.S.

59. Detention during the ninety-day “removal period” is mandatory pursuant to INA § 241(a)(2), 8 U.S.C. § 1231(a)(2). That authority is strictly time-limited. Once the removal period expires, DHS’s mandatory detention authority terminates, and any continued or renewed detention is governed solely by INA § 241(a)(6), 8 U.S.C. § 1231(a)(6), which authorizes only discretionary detention or supervision, subject to constitutional constraints.

60. DHS cannot revive mandatory detention authority years after the statutory removal period has expired simply by re-arresting a compliant noncitizen who has long lived at liberty under an order of supervision. The ninety-day removal period in INA § 241(a)(1) is a finite grant of authority that runs once and does not reset at the government’s discretion. Allowing DHS to resurrect mandatory detention through unilateral re-detention would nullify *Zadvydas v. Davis*, 533 U.S. 678 (2001), and permit *de facto* indefinite detention by executive fiat, untethered to any realistic prospect of removal or constitutionally required process.

1 61. In *Zadvydas v. Davis*, 533 U.S. 678 (2001), the Supreme Court held that
2 INA § 241(a)(6) must be interpreted to avoid serious constitutional concerns
3 arising from prolonged or potentially indefinite civil detention. The Court
4 recognized that post-removal-period detention is permissible only for a period
5 reasonably necessary to effectuate removal and becomes constitutionally
6 impermissible where there is “no significant likelihood of removal in the
7 reasonably foreseeable future.” *Id.* at 690. Section 241(a)(6) therefore does not
8 authorize automatic, indefinite, or summary detention once the removal period has
9 expired.
10

11
12 62. Here, Petitioner’s order of removal became administratively final on or
13 about November 10, 2021. DHS allowed the statutory removal period to lapse and
14 affirmatively placed Petitioner on supervision pursuant to INA § 241(a)(3), under
15 which Petitioner remained at liberty for years while fully complying with all
16 reporting and supervision requirements. During that time, DHS did not effectuate
17 removal, identify a third country willing to accept Petitioner, or allege any
18 violation of supervision conditions.
19

20 63. Where, as here, DHS has permitted a noncitizen to live at liberty under
21 an order of supervision for an extended period of time, any later attempt to detain
22 under INA § 241(a)(6) is subject to heightened constitutional scrutiny. The Due
23 Process Clause protects an individual’s substantial liberty interest in continued
24 freedom from physical restraint, and that interest deepens over time when the
25 government has acquiesced in liberty. *See Zadvydas*, 533 U.S. at 690; *Morrissey v.*
26 *Brewer*, 408 U.S. 471, 482 (1972).
27
28

64. Accordingly, even where DHS asserts authority under INA § 241(a)(6),

1 due process requires notice and an individualized determination by a neutral
2 decisionmaker that re-detention is justified based on danger or flight risk.
3 Summary re-detention without such procedural safeguards creates an unacceptably
4 high risk of erroneous deprivation of liberty and violates the Fifth Amendment. *See*
5 *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976).
6

7 65. Respondents re-detained Petitioner years after the expiration of the
8 removal period without providing prior written notice, without identifying any
9 changed factual circumstances or realistic prospect of removal, and without
10 affording Petitioner a hearing before a neutral decisionmaker to assess whether
11 detention was necessary to mitigate any risk of flight or danger to the community.
12 Such re-detention exceeds the constitutional limits imposed on INA § 241(a)(6)
13 detention and violates Petitioner's right to due process.
14

15 66. Because Respondents' actions are not reasonably related to effectuating
16 removal and were imposed without constitutionally required procedural
17 protections, Petitioner's continued detention is unlawful. Petitioner is therefore
18 entitled to immediate release from custody unless and until Respondents provide
19 constitutionally adequate process consistent with the Fifth Amendment.
20

21 67. The Petitioner over the past five years has complied with all requirements
22 and provisions set forth.
23

24
25 PRAYER FOR RELIEF

26 Petitioner respectfully requests that this Court:

27 A. Assume jurisdiction over this matter;
28

1 B. Issue an Order to Show Cause ordering Respondents to show cause
2 within three days as to why this Petition should not be granted as
3 required by 28 U.S.C. § 2243; and ordering that they not transfer
4 Petitioner out of this district during the pendency of the court's
5 adjudication of this petition;
6

7 C. Issue a Writ of Habeas Corpus ordering Respondents to release Mr.
8 Prado from custody immediately and permanently enjoining his re-
9 detention absent written notice and a hearing prior to re-detention where
10 Respondents must prove by clear and convincing evidence that he is a
11 flight risk or danger to the community and that no alternatives to
12 detention would mitigate those risks;
13

14 D. Declare that Mr. Prado's re-detention without an individualized
15 determination before a neutral decision maker violates the Due Process Clause of
16 the Fifth Amendment;
17

18 E. Award reasonable attorneys' fees and costs under the Equal Access to
19 Justice Act, 28 U.S.C. § 2412, or any other applicable authority; and
20

21 F. Grant such other and further relief as this Court deems just and proper.
22

23 Dated: January 22, 2026

24 Respectfully submitted,

25 /s/LeRoy George Siddell
26 LeRoy George Siddell
27 Attorney for Petitioner
28

1 VERIFICATION OF COUNSEL

2 I, LeRoy George Siddell, hereby certify that I am familiar with the case of the
3 named Petitioner and that the facts as stated above are true and correct to the best
4 of my knowledge and belief.

5 s/LeRoy George Siddell
6 attorneysiddell@yahoo.com
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EXHIBIT LIST

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A. Notice to Alien of File Custody Review

B. IJ Order

C. Grant of Withholding of Removal (2021)