

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil No. 26-cv-00752-JMG-EMB

REYES ALVAREZ-JUAREZ,

Petitioner,

v.

**FEDERAL RESPONDENTS'
RESPONSE TO PETITION FOR
WRIT OF HABEAS CORPUS**

PAMELA BONDI, *et al.*,

Respondents.

Petitioner filed this petition for a writ of habeas corpus to secure a bond hearing in connection with Petitioner's detention by the U.S. Immigration and Customs Enforcement ("ICE"). The Federal Respondents acknowledge that this petition raises legal and factual issues similar to those in prior habeas petitions this Court has decided. *See, e.g., Velasco Hurtado v. Bondi*, No. 26-cv-00546-JMG-DLM (D. Minn. order filed Jan. 24, 2026). As of the time of this filing, ICE has not provided the Federal Respondents' undersigned counsel with any warrant of arrest, and the Federal Respondents acknowledge that many judges in this District conclude that the absence of a warrant preceding a petitioner's arrest necessitates immediate release. Those issues are currently 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 31, 2026

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s/ Trevor Brown

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