

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Civil No: 0:26-cv-00793-NEB-DLM

Cortez Celis,

Petitioner,

v.

Pamela Bondi, *et al.*,

Respondents.

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

Petitioner, Denis Alexander Villegas Avalos, filed this petition for a writ of habeas corpus to secure release or a bond hearing in connection with Petitioners' detention by the U.S. Immigration and Customs Enforcement. This petition raises legal and factual issues similar to those in prior habeas petitions this Court has decided. Those issues are currently before the Eighth Circuit on expedited review in *Avila v. Bondi*, No. 25-3248 (8th Cir. docketed Nov. 10, 2025). Mr. Mancía entered the United States, and is not a legal resident, nor does he have any form of formal status, and concedes in his Petition that he is not here legally. For purposes of expediting these proceedings, the Federal Respondents, Pamela Bondi, Kristi Noem, Todd Lyons, and David Easterwood, 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 Petitioners' habeas petition.

Dated: January 30, 2026

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s/ [Matthew Isihara]

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