

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Civil No. 26-cv-00918-DMT-JFD

RAYMILE DE LOS ANGELES  
PALOMARES PEREZ,

Petitioner,

v.

PAMELA BONDI, *et al.*,

Respondents.

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

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. 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). 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. It should be noted that Agency believes her TPS status has been terminated, rendering this portion of the Petitioner's brief moot.

*Signature Page to Follow*

Dated: February 4, 2026

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