

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Jonathan A. L.,

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,
and

David Easterwood, Acting Director, St.
Paul Field Office Immigration and
Customs Enforcement.

Respondents.

Case No. 26-cv-925

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

REPLY

1. Petitioner filed a Verified Writ for Petition of Habeas Corpus on February 1, 2026.
2. The Court issued an Order on February 1, 2026 [Doc. 3].
3. The Court's Order required Respondents to file an Answer by February 4, 2026, and in their Answer include:

- a. Such affidavits and exhibits as are needed to establish the lawfulness and correct duration of Petitioner's detention in light of the issues raised in the habeas petition;
 - b. A reasoned memorandum of law and fact explaining respondents' legal position on Petitioner's claims;
 - c. Respondents' recommendation on whether an evidentiary hearing should be conducted; and
 - d. Whether the absence of a warrant preceding Petitioner's arrest necessitates Petitioner's immediate release.
4. The Respondents filed an Answer on February 4, 2026 [Doc. 5].
 5. The Respondent's Answer failed to address all items in ¶2 of the Court's Order.
 6. Critical to this case, Respondents do not dispute any of the factual allegations in Petitioner's petition, including the absence of a warrant preceding Petitioner's arrest.
 7. Petitioner therefore respectfully requests that the Court issue a writ of habeas corpus requiring Respondents to release Petitioner unless they provide a bond hearing under 8 U.S.C. § 1226(a) within seven days.

Date: February 5, 2026



Jason L. Schellack
901 North Third Street, Suite 120
Minneapolis, MN 55401
jason@autismlawcenter.com
612-200-9920
Attorney for Petitioner