UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

Pedro Alexander Mendez-Lainez, 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, Marisa Flores, Director, El Paso Field Office Immigration and Customs Enforcement, and Curtis Taylor, Major General, U.S. Army at Camp Bliss. Respondents.	Case No. 5:26-cv-667 **REPLY IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS** Expedited Handling Requested

Petitioner Pedro Alexander Mendez-Lainez submits the following Reply in Support of his Petition for Writ of Habeas Corpus and to clarify the circumstances surrounding his appeal of the Immigration Judge's March 3 order.[1]

[1] The following recitation of facts is based on communications with Petitioner and Petitioner's immigration counsel, Rachel Engebretson.

Petitioner has been in Respondents' custody since December 16, 2025, over four months now. Dkt. 6, ¶ 3. While in Respondents' custody, Petitioner has been unable to work and has had limited ability to contact and retain counsel for his immigration case. Petitioner was finally able to secure immigration counsel shortly before the March 3 hearing (the "Hearing") cited by the government. However, because she was retained the day before Petitioner's Hearing, Ms. Engebretson, Petitioner's immigration counsel, did not have time to review his file or adequately prepare for the merits hearing. Despite Ms. Engebretson communicating these circumstances to the Immigration Judge and seeking a continuance of the Hearing, the Immigration Judge ordered the Hearing to proceed on March 3. The Hearing resulted in an order denying asylum and ordering Petitioner's removal. *See* Dkt. 9-3. However, Petitioner reserved the right to appeal.

In advance of the April 6 deadline to appeal, Ms. Engebretson informed the undersigned that she had prepared the appeal, as well as a fee waiver, pursuant to a conversation she had with Petitioner. On April 7, Petitioner informed the undersigned that Respondent ICE notified him that no appeal was entered and that he would be deported. That same day, Ms. Engebretson informed the undersigned that the appeal and fee waiver had been prepared, but that a system error had prevented its timely filing and that she was working with the clerk to overcome the technical error in the ECAS. On April 15, Ms. Engebretson reached out to the undersigned providing confirmation that the appeal was successfully filed. Accordingly, Petitioner has filed an appeal of the March 3 Order of Removal, maintains that the merits of his asylum case are strong, and continues to seek release from Respondents' custody during the pendency of his immigration case so that he

may return to caring for his daughter, working, and contributing to his community in Minnesota.

Date: 4/17/2026

/s/ River E. Lord

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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of April 2026, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

s/ River E. Lord

River E. Lord