

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)

KIRANKUMAR ASHABEN CHAUDHARI, *
Petitioner, * Case No. 1:26-cv-00580-SAG
v. *
KRISTI NOEM, *et al.*, *
Respondents. *
* * * * *

JOINT NOTICE

Petitioner, Kirankumar Ashaben Chaudhari, and Respondents, United States Department of Homeland Security (“DHS”) Secretary Kristi Noem, United States Immigration and Customs Enforcement (“ICE”) Acting Director Todd Lyons, ICE Baltimore Field Office Acting Field Office Director Vernon Liggins, and United States Attorney General Pamela Bondi, by and through their respective undersigned counsel, submit this Joint Notice and state:

The Parties submit that the factual and legal issues presented in the instant habeas petition do not materially differ from those presented in *Lopez v. Noem*, Case No. 25-cv-03662-GLR, 2025 WL 3496195 (D. Md. Dec. 5, 2025). Specifically, similar to that case, the Petition here concerns whether a noncitizen who is present in the United States without admission and who has been charged as inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i) is entitled to a bond hearing under 8 U.S.C. § 1226(a) when they were previously encountered and detained by DHS at or near the border, were placed into 8 U.S.C. § 1229a removal proceedings, were released on an Alternatives to Detention (“ATD”) agreement, but subsequently had their release revoked due to alleged ATD violations and were re-detained for said alleged ATD violations under 8 U.S.C. § 1226(b) during

the pendency of their removal proceedings. As such, unless the Court prefers further briefing on that issue, the Parties submit that this Court should incorporate the Respondents' filings in *Lopez* into the record of this habeas action in lieu of further briefing. Respondents ask that the Court consider the arguments made by the Government in *Lopez*, including all jurisdictional arguments, as if they were presented by Respondents in briefing filed in this case.

Should the Court be inclined to grant relief to Petitioner in this case, the Parties request that the Court enter an Order:

1. Finding that Petitioner is detained under 8 U.S.C. § 1226(a) and is entitled to, and shall seek, a bond hearing pursuant to the regulations provided at 8 C.F.R. § 236.1(d), 8 C.F.R. § 1003.19 and 8 C.F.R. § 1236.1(d);
2. Requiring that the bond hearing occur within ten days of Petitioner's filing such request and the bond hearing be conducted pursuant to 8 U.S.C. § 1226(a);
3. Requiring that any bond hearing for Petitioner be conducted in an Immigration Court with jurisdiction, or administrative control, over Petitioner's detention;
4. Providing that, if bond is granted and Petitioner is released, nothing in the Court's Order precludes ICE from imposing reasonable conditions of release;
5. Providing that, if Petitioner is not provided with a bond hearing before an Immigration Judge in compliance with the Order, Respondents shall release Petitioner from custody, with reasonable conditions, which may include the requirement that Petitioner appear for a bond hearing at Immigration Court in Maryland;

6. Directing that the Parties shall provide the Court with a Joint Status Report within 14 days of the date of the Court's Order; and

7. Denying any request for attorney's fees and costs.

Dated: February 13, 2026

Respectfully submitted,

/s/ Leah Haynes
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Counsel for Respondents

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of February, 2026, a copy of the foregoing Joint Notice was served electronically on all parties and counsel receiving service via CM/ECF in this case.

/s/ Kristy Burkhardt
Kristy Burkhardt
Special Assistant United States Attorney