

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

Fabel Antonio LEMUS CARDONA

Petitioner,

No. **8:26-cv-00606-DLB**

v.

Kristi Noem, et. al

Respondents.

**ADDITIONAL AMENDMENT TO PETITIONER'S AMENDED HABEAS CORPUS
PETITION**

Petitioner hereby makes an additional amendment to his amended habeas corpus to clarify and include in Petitioner's First and Fourth Claims for Relief, as stated below:

Importantly, similar to the petitioners in *Oliveira v. Edlow*, 2025 U.S. Dist. LEXIS 251364 (D. Mass. Dec. 30, 2025), Petitioner Lemus is not challenging the validity of his removal order or seeking to enjoin Respondents from executing that order. Rather, Petitioner challenges, inter alia, Respondents' effective revocation of a deferred action program. As the Supreme Court has explained, challenges to the revocation of deferred action-type relief do not fall within the "narrow"

jurisdictional bar of 8 U.S.C. § 1252(g). See *Dep't of Homeland Sec. v. Regents of the Univ. of Cal.*, 591 U.S. 1, 19, 140 S. Ct. 1891, 207 L. Ed. 2d 353 (2020), as quoted in *Oliveira, supra*.

AMENDED PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Honorable Court:

- 1) Continue jurisdiction over this matter;
- 2) Grant a Writ of Habeas Corpus ordering Respondents to release Petitioner immediately, on reasonable conditions of supervision if necessary;
- 3) Grant a preliminary injunction against Respondents, enjoining them from applying their 2025 Policy to Petitioner, effectively revoking deferred action for U-Visa Petitioners;
- 4) Order Respondents to show cause, returnable within seven days pursuant to 28 U.S.C. §2243, as to why the relief requested in this petition should not be granted;
- 5) Declare the Petitioner's detention is unlawful and violates, inter alia, the Fourth and Fifth Amendments, the VTPVA, and the APA.
- 6) Grant such further relief as the Court deems just and proper.

Dated: March 3, 2026

/s/ Ronald D. Richey
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