

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:26-cv-00763

EDUIN VEGA CACERES,

Petitioner,

v.

JUAN BALTAZAR, in his official capacity as Warden of the Denver Contract Detention Facility;
ROBERT HAGAN, in his official capacity as Field Office Director, Denver Field Office of U.S.
Immigration and Customs Enforcement;
TODD LYONS, in his official capacity as Acting Director of U.S. Immigration and Customs
Enforcement;
MARKWAYNE MULLIN, in his official capacity as Secretary of U.S. Department of Homeland
Security; and
PAMELA BONDI, in her official capacity as Attorney General of the United States.

Respondents.

**PETITIONER'S REPLY IN SUPPORT OF PETITION FOR
WRIT OF HABEAS CORPUS**

Petitioner, EDUIN VEGA CACERES, by and through undersigned counsel, respectfully submits this Reply in Support of his Petition for Writ of Habeas Corpus (ECF No. 1) and in response to Respondents' Response at ECF No. 14. The Court has already resolved the dispositive legal issue in Vega Caceres's favor, and Respondents' Response does not disturb that conclusion. The only remaining dispute is therefore the form and timing of relief.

Respondents propose that, if the Court is inclined to order Vega Caceres's immediate release, he must first post the \$5,000 bond set by the Immigration Judge; counsel must then confer regarding whether Vega Caceres seeks ICE transportation to Florida or release in Colorado; Respondents must file a status report within 36 hours; and, if Vega Caceres elects ICE

transportation, Respondents should have three days after bond processing to complete transport. ECF No. 14 at 6-7.

First, although Vega Caceres maintains that release should not be conditioned on payment of bond under these circumstances, Vega Caceres can post the bond if the Court so orders in order to avoid any further delay in his release.

Second, as to destination, Vega Caceres can advise now that, if released, he requests transportation to Florida, not release in Colorado. Because Vega Caceres is making that election now, there is no need for the Court to require an additional conferral process or a 36-hour status report simply to determine his preference. The Court can instead order the relief directly.

Third, Vega Caceres does not dispute that Respondents require a reasonable period to process release and arrange transportation. But that period must be short, definite, and no longer than necessary to effectuate the Court's order. Vega Caceres's return to Florida is urgent. His children are suffering in his absence. Most significantly, his daughter is under psychiatric care, has been diagnosed with generalized anxiety disorder, and is currently taking prescribed sleep and anti-anxiety medication. *See Letter Confirming Patient Care for U.S. Citizen Daughter, L. Vega, dated March 17, 2026, attached hereto as Attachment A.* Under these circumstances, any further delay in reunification will prolong a serious and ongoing family hardship. Vega Caceres therefore respectfully requests that the Court order Respondents to complete his release and transportation to Florida no later than March 27, 2026. That deadline accounts for the practical realities of processing release while still ensuring meaningful relief before his currently scheduled March 30, 2026, Individual Hearing.

Accordingly, Vega Caceres respectfully requests that the Court order as follows: (1) if the Court requires payment of the \$ 5,000 bond set by the Immigration Judge, Respondents shall allow

Vega Caceres to post it promptly and Respondents shall process the bond without delay; (2) Respondents shall transport Vega Caceres by ICE to his residence in Florida, rather than release him in Colorado; and (3) Respondents shall complete Vega Caceres's release and transport no later than March 27, 2026.

Dated this 20th day of March 2026.

Respectfully submitted,

/s/ Skylar M. Larson

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ATTORNEY FOR PETITIONER

CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2026, I electronically filed the foregoing **Petitioner's Reply in Support Petition for Writ of Habeas Corpus with Attachment A** with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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/s/ Skylar M. Larson
Skylar M. Larson, Esq.

ATTORNEY FOR PETITIONER

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**PETITIONER'S ATTACHMENT TO REPLY IN SUPPORT OF PETITION FOR
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ATTACHMENT A. Letter Confirming Patient Care for U.S. Citizen Daughter, L. Vega,
dated March 17, 2026