

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
Valdosta Division**

AMANDEEP AMANDEEP,

Petitioner,

v.

KRISTI NOEM, *Secretary of Homeland Security,*

TODD LYONS, *Acting Director, U.S. Immigration
and Customs Enforcement,*

GEORGE STERLING, *Director, Atlanta ICE
Field Office*

PAMELA BONDI, *Attorney General, U.S
Department of Justice*

DAVID PAULK, *Warden, Irving County
Detention Center*

Respondents.

Civil Action No. 7:26-cv-00048-
LAG-ALS

REPLY IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS

Pursuant to the Court's March 4, 2026, Order, ECF No. 4, Petitioner submits this Reply in support of his Petition.

Petitioner agrees with Respondents that the Court's decision in *J.A.M. v. Streeval*, controls in his case. *See* 2025 WL 3050094 (M.D. Ga. Nov. 1, 2025) (rejecting the Government's interpretation of "applicant for admission" in 8 U.S.C. § 1225(b)(2)).

Given that the law is clear and the facts are not in dispute, the Court should be able to issue a decision based on the evidence and written arguments submitted, without the need of an evidentiary hearing.¹

Respectfully submitted,

Dated: March 27, 2026

/s/ Benjamin Osorio
BENJAMIN OSORIO
Georgia State Bar no. 194702
Murray Osorio PLLC
4103 Chain Bridge Road, Suite 300
Fairfax, Virginia 22030
Telephone: 703-352-2399
Facsimile: 703-763-2304
benjamin@murrayosorio.com

Counsel for Petitioner

¹ Petitioner is aware that the Fifth Circuit and the Eighth Circuit have upheld the Government's interpretation of "applicant for admission" in 8 U.S.C. § 1225(b)(2). *See Herrera Avila v. Bondi*, 2026 WL 819258 (8th Cir. Mar. 25, 2026); *Buenrostro-Mendez v. Bondi*, 166 F.4th 494 (5th Cir. 2026). These decisions, however, are neither binding on this Court nor persuasive in their reasoning. *Compare Herrera Avila*, 2026 WL 819258 at *6–8 (Erickson, J., dissenting) and *Buenrostro-Mendez*, 166 F.4th at 509–21 (Douglas, J., dissenting) *with J.A.M.*, 2025 WL 3050094 at *2–5.