

Erin O'Brien, Esq.
Global Immigration Legal Team, LLC
150 Strafford Avenue, Suite 115
Wayne, PA 19087
p. 610-975-4599
f. 610-687-2100
erin@giltlaw.com

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

MANOJ, MANOJ

Petitioner,

v.

JOHN RIFE, Acting Field Office Director of
Enforcement and Removal Operations,
Philadelphia Field Office, IMMIGRATION
AND CUSTOMS ENFORCEMENT;

Kristi NOEM, Secretary, U.S. Department of
Homeland Security; U.S. DEPARTMENT OF
HOMELAND SECURITY;

Pamela BONDI, U.S. Attorney General;
EXECUTIVE OFFICE FOR IMMIGRATION
REVIEW;

Jamal LAWRENCE, Warden of
PHILADELPHIA FEDERAL DETENTION
CENTER.

Respondents.

Case No. 2:26-cv-1742

**PETITION FOR WRIT OF
HABEAS CORPUS**

INTRODUCTION

1. Petitioner Manoj Manoj is in the physical custody of Respondents at the Federal Detention Center in Philadelphia. He now faces unlawful detention because the Department of Homeland Security (DHS) and the Executive Office of Immigration Review (EOIR) have concluded Petitioner is subject to mandatory detention.

2. Petitioner is charged with, inter alia, having entered the United States without admission or inspection. *See* 8 U.S.C. § 1182(a)(6)(A)(i).

3. Based on this allegation in Petitioner's removal proceedings, DHS denied Petitioner's release from immigration custody, consistent with a new DHS policy issued on July 8, 2025, instructing all Immigration and Customs Enforcement (ICE) employees to consider anyone inadmissible under § 1182(a)(6)(A)(i)—i.e., those who entered the United States without admission or inspection—to be subject to detention under 8 U.S.C. § 1225(b)(2)(A) and therefore ineligible to be released on bond.

4. Similarly, on September 5, 2025, the Board of Immigration Appeals (BIA or Board) issued a precedent decision, binding on all immigration judges, holding that an immigration judge has no authority to consider bond requests for any person who entered the United States without admission. *See Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025). The Board determined that such individuals are subject to detention under 8 U.S.C. § 1225(b)(2)(A) and therefore ineligible to be released on bond.

5. Petitioner's detention on this basis violates the plain language of the Immigration and Nationality Act. Section 1225(b)(2)(A) does not apply to individuals like Petitioner who were detained pursuant to an administrative warrant under § 1226(a) when they were apprehended by ICE. Instead, upon arrest and detention by ICE of someone already residing in

1 the interior of the United States, such individuals are still subject to § 1226(a), that allows for
2 release on conditional parole or bond. That statute expressly applies to people who, like
3 Petitioner, are charged as inadmissible for having entered the United States without inspection
4 and are residing inside the United States.

5 6. Respondents' new legal interpretation is plainly contrary to the statutory
6 framework and contrary to decades of agency practice applying § 1226(a) to people like
7 Petitioner.

8 7. Accordingly, Petitioner seeks a writ of habeas corpus requiring that he be
9 immediately released, as his detention was unlawful from the start, or in the alternative, that
10 Respondents provide a bond hearing under § 1226(a) within seven days.

11 JURISDICTION

12 8. Petitioner is in the physical custody of Respondents. Petitioner is detained at the
13 Philadelphia Federal Detention Center in Philadelphia, Pennsylvania.

14 9. This Court has jurisdiction under 28 U.S.C. § 2241(c)(5) (habeas corpus), 28
15 U.S.C. § 1331 (federal question), and Article I, section 9, clause 2 of the United States
16 Constitution (the Suspension Clause).

17 10. This Court may grant relief pursuant to 28 U.S.C. § 2241, the Declaratory
18 Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.

19 VENUE

20 11. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 493-
21 500 (1973), venue lies in the United States District Court for the Eastern District of
22 Pennsylvania, the judicial district in which Petitioner currently is detained.

12. Venue is also properly in this Court pursuant to 28 U.S.C. § 1391(e) because Respondents are employees, officers, and agencies of the United States, and because a substantial part of the events or omissions giving rise to the claims occurred in the Eastern District.

REQUIREMENTS OF 28 U.S.C. § 2243

13. The Court must grant the petition for writ of habeas corpus or order Respondents to show cause “forthwith,” unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, Respondents must file a return “within three days unless for good cause additional time, not exceeding twenty days, is allowed.” *Id.*

14. Habeas corpus is “perhaps the most important writ known to the constitutional law . . . affording as it does a *swift* and imperative remedy in all cases of illegal restraint or confinement.” *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added). “The application for the writ usurps the attention and displaces the calendar of the judge or justice who entertains it and receives prompt action from him within the four corners of the application.” *Yong v. I.N.S.*, 208 F.3d 1116, 1120 (9th Cir. 2000) (citation omitted).

PARTIES

15. Petitioner Manoj is a citizen of India who has been in immigration detention since March 16, 2026. ICE agents arrested Petitioner at his scheduled ICE appointment in Philadelphia, Pennsylvania. ICE did not conduct a custody re-determination or set bond, and Petitioner is unable to obtain review of his custody by an IJ, pursuant to the Board’s decision in *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025).

16. Respondent John Rife is the Acting Director of the Philadelphia Field Office of ICE’s Enforcement and Removal Operations division. As such, John Rife is Petitioner’s

1 immediate custodian and is responsible for Petitioner's detention and removal. He is named in
2 his official capacity.

3 17. Respondent Kristi Noem is the Secretary of the Department of Homeland
4 Security. She is responsible for the implementation and enforcement of the Immigration and
5 Nationality Act (INA), and oversees ICE, which is responsible for Petitioner's detention. Ms.
6 Noem has ultimate custodial authority over Petitioner and is sued in her official capacity.

7 18. Respondent Department of Homeland Security (DHS) is the federal agency
8 responsible for implementing and enforcing the INA, including the detention and removal of
9 noncitizens.

10 19. Respondent Pamela Bondi is the Attorney General of the United States. She is
11 responsible for the Department of Justice, of which the Executive Office for Immigration Review
12 and the immigration court system it operates is a component agency. She is sued in her official
13 capacity.

14 20. Respondent Executive Office for Immigration Review (EOIR) is the federal
15 agency responsible for implementing and enforcing the INA in removal proceedings, including
16 for custody redeterminations in bond hearings.

17 21. Respondent Jamal Lawrence is employed by the Bureau of Prisons as Warden of
18 the Federal Detention Center where Petitioner is detained. Mr. Lawrence has immediate physical
19 custody of Petitioner. He is sued in his official capacity.

20 **FACTS**

21 22. Petitioner is a 24-year-old citizen and national of India.

22 23. Petitioner has resided in the United States since January 31, 2024, and lives in
23 Philadelphia, Pennsylvania.

1 24. Petitioner fled India to seek asylum and related protections from persecution and
2 torture in the United States.

3 25. On or about January 31, 2024, Petitioner crossed the border into the United States,
4 and shortly thereafter was apprehended by immigration officials. On or about January 31, 2024,
5 Petitioner was released from immigration detention. On or about January 31, 2024, Petitioner
6 was placed in removal proceedings under 8 U.S.C. § 1229(a) / INA § 240. *See* Exh. A.
7 Petitioner was required to attend routine check-ins with ICE and attended all check-ins with ICE
8 successfully. After entering the United States, Petitioner filed his asylum application.

9 26. ICE has charged Petitioner with, *inter alia*, being inadmissible under 8 U.S.C. §
10 1182(a)(6)(A)(i) as someone who entered the United States without inspection.

11 27. On March 16, 2026, Petitioner was at the ICE office during his scheduled check
12 in at Philadelphia, PA.

13 28. Petitioner had attended check-ins without incident since he was required to do so.

14 29. Petitioner is now detained at the Federal Detention Center in Philadelphia, PA.
15 *See* Exh. B.

16 30. Additionally, DHS already determined that Petitioner was not a danger to the
17 community or risk of flight when they released him on or about January 31, 2024. Nothing has
18 occurred between that initial determination and Petitioner's detention on January 28, 2026 that
19 would render him a danger to the community or a flight risk, and Respondents have not
20 furnished any explanation as to changed circumstances that would warrant Petitioner's re-
21 detention, outside of their own change in policy based on an incorrect interpretation of the
22 statute.

1 31. ICE detained him without explanation on March 16, 2026. Respondent's removal
2 proceedings and potential relief, including his asylum application, remain pending with the
3 immigration court.

4 32. Petitioner is gainfully employed as a food packager at 
5 Inc. in Philadelphia, PA. He has never been criminally arrested or apprehended by law
6 enforcement, apart from his immigration arrest, and has become a valued member of his
7 community. Petitioner filed an application for asylum that remains pending before the
8 immigration court, evincing his eligibility for relief before the court. Petitioner is neither a flight
9 risk nor a danger to the community.

10 33. Pursuant to *Matter of Yajure Hurtado*, the immigration judge is unable to consider
11 Petitioner's bond request because he entered the United States without inspection.

12 34. As a result, Petitioner remains in detention. Without relief from this court, he
13 faces the prospect of months, or even years, in immigration custody.

14 LEGAL FRAMEWORK

15 **I. Section 1226(a) Governs the Detention of People Like Petitioner Who are Detained in** 16 **the United States and Have Not Previously Been Admitted**

17 35. The INA prescribes three basic forms of detention for the vast majority of
18 noncitizens in removal proceedings.

19 36. First, 8 U.S.C. § 1226 authorizes the detention of noncitizens in standard removal
20 proceedings before an IJ. *See* 8 U.S.C. § 1229a. Individuals in § 1226(a) detention are generally
21 entitled to a bond hearing at the outset of their detention, *see* 8 C.F.R. §§ 1003.19(a), 1236.1(d),
22 while noncitizens who have been arrested, charged with, or convicted of certain crimes are
23 subject to mandatory detention, *see* 8 U.S.C. § 1226(c).
24

1 37. Second, the INA provides for mandatory detention of noncitizens subject to
2 expedited removal under 8 U.S.C. § 1225(b)(1) and for other recent arrivals seeking admission
3 referred to under § 1225(b)(2).

4 38. Last, the INA also provides for detention of noncitizens who have been ordered
5 removed, including individuals in withholding-only proceedings, *see* 8 U.S.C. § 1231(a)–(b).

6 39. This case concerns the detention provisions at §§ 1226(a) and 1225(b)(2).

7 40. The detention provisions at § 1226(a) and § 1225(b)(2) were enacted as part of the
8 Illegal Immigration Reform and Immigrant Responsibility Act (IIRIRA) of 1996, Pub. L. No.
9 104–208, Div. C, §§ 302–03, 110 Stat. 3009–546, 3009–582 to 3009–583, 3009–585. Section
10 1226(a) was most recently amended earlier this year by the Laken Riley Act, Pub. L. No. 119–1,
11 139 Stat. 3 (2025).

12 41. Following the enactment of the IIRIRA, EOIR drafted new regulations explaining
13 that, in general, people who entered the country without inspection were not considered detained
14 under § 1225 and that they were instead detained under § 1226(a). *See* Inspection and Expedited
15 Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal Proceedings;
16 Asylum Procedures, 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997).

17 42. Thus, in the decades that followed, most people who entered without inspection
18 and were placed in standard removal proceedings received bond hearings, unless their criminal
19 history rendered them ineligible pursuant to 8 U.S.C. § 1226(c). That practice was consistent
20 with many more decades of prior practice, in which noncitizens who were not deemed “arriving”
21 were entitled to a custody hearing before an IJ or other hearing officer. *See* 8 U.S.C. § 1252(a)
22 (1994); *see also* H.R. Rep. No. 104–469, pt. 1, at 229 (1996) (noting that § 1226(a) simply
23 “restates” the detention authority previously found at § 1252(a)). Even individuals who were
24

1 apprehended at the border and not immediately detained but placed in standard removal
2 proceedings under 8 U.S.C. § 1229a, would historically have been considered detained under
3 § 1226(a) should they alter been detained in the interior of the U.S., and thus eligible for bond
4 before an immigration judge.

5 43. On July 8, 2025, ICE Director Todd M. Lyons, “in coordination with” DOJ,
6 announced a new policy that rejected well-established understanding of the statutory framework
7 and reversed decades of practice. The policy states DHS had “revisited” its legal position and
8 believed that § 1225, not § 1226, governs the detention of noncitizens who are present in the
9 United States without having been admitted. *Diaz Martinez, Hyde*, No. 25-11613, 2025 WL
10 2084238, -- F. Supp. 3d --, at *4 (D. Mass. July 24, 2025).

11 44. The new policy, entitled “Interim Guidance Regarding Detention Authority for
12 Applicants for Admission,” claims that all persons who entered the United States without
13 inspection shall now be subject to mandatory detention provision under § 1225(b)(2)(A). The
14 policy applies regardless of when a person is apprehended and affects those who have resided in
15 the United States for months, years, and even decades.

16 45. On September 5, 2025, the BIA adopted this same position in a published
17 decision, *Matter of Yajure Hurtado*. There, the Board held that all noncitizens who entered the
18 United States without admission or parole are subject to detention under § 1225(b)(2)(A) and are
19 ineligible for IJ bond hearings.

20 46. This followed a May 15, 2025, decision by the BIA holding an applicant for
21 admission arrested without a warrant while arriving in the United States and subsequently placed
22 into removal proceedings is detained under 8 U.S.C. § 1225(b). *Matter of Q. Li*, 29 I&N Dec. 66
23 (BIA 2025).

1 47. Since Respondents adopted their new policies, dozens of federal courts have
2 rejected their new interpretation of the INA's detention authorities. Courts have likewise rejected
3 *Matter of Yajure Hurtado*, which adopts the same reading of the statute as ICE.

4 48. Subsequently, court after court has adopted the same reading of the INA's
5 detention authorities and rejected ICE and EOIR's new interpretation. *See, e.g., Rodriguez*
6 *Vazquez v. Bostock*, 779 F. Supp. 3d 1239 (W.D. Wash. 2025); *Gomes v. Hyde*, No. 1:25-CV-
7 11571-JEK, 2025 WL 1869299 (D. Mass. July 7, 2025); *Diaz Martinez v. Hyde*, No. CV 25-
8 11613-BEM, --- F. Supp. 3d ----, 2025 WL 2084238 (D. Mass. July 24, 2025); *Rosado v.*
9 *Figueroa*, No. CV 25-02157 PHX DLR (CDB), 2025 WL 2337099 (D. Ariz. Aug. 11, 2025),
10 *report and recommendation adopted*, No. CV-25-02157-PHX-DLR (CDB), 2025 WL 2349133
11 (D. Ariz. Aug. 13, 2025); *Lopez Benitez v. Francis*, No. 25 CIV. 5937 (DEH), 2025 WL
12 2371588 (S.D.N.Y. Aug. 13, 2025); *Maldonado v. Olson*, No. 0:25-cv-03142-SRN-SGE, 2025
13 WL 2374411 (D. Minn. Aug. 15, 2025); *Arrazola-Gonzalez v. Noem*, No. 5:25-cv-01789-ODW
14 (DFMx), 2025 WL 2379285 (C.D. Cal. Aug. 15, 2025); *Romero v. Hyde*, No. 25-11631-BEM,
15 2025 WL 2403827 (D. Mass. Aug. 19, 2025); *Samb v. Joyce*, No. 25 CIV. 6373 (DEH), 2025
16 WL 2398831 (S.D.N.Y. Aug. 19, 2025); *Ramirez Clavijo v. Kaiser*, No. 25-CV-06248-BLF,
17 2025 WL 2419263 (N.D. Cal. Aug. 21, 2025); *Leal-Hernandez v. Noem*, No. 1:25-cv-02428-
18 JRR, 2025 WL 2430025 (D. Md. Aug. 24, 2025); *Kostak v. Trump*, No. 3:25-cv-01093-JE-
19 KDM, 2025 WL 2472136 (W.D. La. Aug. 27, 2025); *Jose J.O.E. v. Bondi*, No. 25-CV-3051
20 (ECT/DJF), --- F. Supp. 3d ----, 2025 WL 2466670 (D. Minn. Aug. 27, 2025) *Lopez-Campos v.*
21 *Raycraft*, No. 2:25-cv-12486-BRM-EAS, 2025 WL 2496379 (E.D. Mich. Aug. 29, 2025);
22 *Vasquez Garcia v. Noem*, No. 25-cv-02180-DMS-MM, 2025 WL 2549431 (S.D. Cal. Sept. 3,
23 2025); *Zaragoza Mosqueda v. Noem*, No. 5:25-CV-02304 CAS (BFM), 2025 WL 2591530 (C.D.

1 Cal. Sept. 8, 2025); *Pizarro Reyes v. Raycraft*, No. 25-CV-12546, 2025 WL 2609425 (E.D.
2 Mich. Sept. 9, 2025); *Sampiao v. Hyde*, No. 1:25-CV-11981-JEK, 2025 WL 2607924 (D. Mass.
3 Sept. 9, 2025); *see also, e.g., Palma Perez v. Berg*, No. 8:25CV494, 2025 WL 2531566, at *2
4 (D. Neb. Sept. 3, 2025) (noting that “[t]he Court tends to agree” that § 1226(a) and not §
5 1225(b)(2) authorizes detention); *Jacinto v. Trump*, No. 4:25-cv-03161-JFB-RCC, 2025 WL
6 2402271 at *3 (D. Neb. Aug. 19, 2025) (same); *Anicasio v. Kramer*, No. 4:25-cv-03158-JFB-
7 RCC, 2025 WL 2374224 at *2 (D. Neb. Aug. 14, 2025) (same). This is just a sample of the
8 courts who have ruled on this issue. To date, there are at least 283 judges in courts across the
9 country who have found in favor of the petitioner on this issue. *See also* Exh. C.

10 49. This includes at least seven judges sitting in the Eastern District of Pennsylvania,
11 where this case arises. *See Demirel v. FDC Philadelphia, et al.*, No. 25-cv-05488 at *6 (E.D. Pa.
12 Nov. 18, 2025) (Diamond, J.); *Kashranov v. Jamison*, No. 25-cv-5555, 2025 WL 3188399 at *4
13 (E.D. Pa. Nov. 14, 2025) (Wolson, J.); *Cantu-Cortes v. O’Neill, et al.*, No. 25-cv-6338, 2025 WL
14 3171639, at *1 (E.D. Pa. Nov. 13, 2025) (Kenney, J.); *Patel v. McShane, et al.*, No. 25-cv-5975
15 (E.D. Pa. Nov. 20, 2025) (Brody, J.); *Ndiaye v. Jamison, et al.*, No. 25-cv-6007 (E.D. Pa. Nov.
16 19, 2025) (Sanchez, J.); *Centeno-Ibarra v. Warden of the Federal Detention Center*
17 *Philadelphia, et al.*, No. 25-cv-06312 (E.D. Pa. Nov. 25, 2025) (Rufe, J.); *Juarez Velasquez v.*
18 *O’Neill, et al.*, No. 25-cv-06191 (E.D. Pa. Dec. 3, 2025) (Henry, J.).

19 50. Courts have uniformly rejected DHS’s and EOIR’s new interpretation, including
20 the BIA’s position in *Matter of Yajure Hurtado*, because it defies the INA. As the *Rodriguez*
21 *Vazquez* court and others have explained, the plain text of the statutory provisions demonstrates
22 that § 1226(a), not § 1225(b), applies to people like Petitioner. DHS and DOJ’s longstanding
23
24

1 practice or providing bond hearing to individuals in this position further counsels against the
2 BIA's abrupt change in policy. *Maldonado*, 2025 WL 2374411, at *11.

3 51. Section 1226(a) applies by default to all persons "pending a decision on whether
4 the [noncitizen] is to be removed from the United States." These removal hearings are held under
5 § 1229a, to "decid[e] the inadmissibility or deportability of a[] [noncitizen]."

6 52. The text of § 1226 also explicitly applies to people charged as being inadmissible,
7 including those who entered without inspection. *See* 8 U.S.C. § 1226(c)(1)(E). Subparagraph
8 (E)'s reference to such people makes clear that, by default, such people are afforded a bond
9 hearing under subsection (a). As the *Rodriguez Vazquez* court explained, "[w]hen Congress
10 creates 'specific exceptions' to a statute's applicability, it 'proves' that absent those exceptions,
11 the statute generally applies." *Rodriguez Vazquez*, 779 F. Supp. 3d at 1257 (citing *Shady Grove*
12 *Orthopedic Assocs., P.A. v. Allstate Ins. Co.*, 559 U.S. 393, 400 (2010)); *see also* *Gomes*, 2025
13 WL 1869299, at *7.

14 53. Section 1226 therefore leaves no doubt that it applies to people who face charges
15 of being inadmissible to the United States, including those who are present without admission or
16 parole.

17 54. Under the BIA's interpretation, all noncitizens subject to inadmissibility grounds
18 are detained without the opportunity for a bond hearing under 8 U.S.C. § 1225(b). *Matter of*
19 *Yajure Hurtado*, 29 I&N Dec. at 220; *see* 8 U.S.C. § 1182(a)(6) (making people who are present
20 without having been admitted inadmissible); 8 U.S.C. § 1101(a)(14) (defining an admission).
21 Therefore, this interpretation would render all the grounds of mandatory detention in § 1226(c)
22 applying to inadmissible noncitizens, including the recently passed Laken Riley Act,
23 superfluous. *Gomes*, 2025 WL 1869299, at *7; *Rodriguez*, 779 F. Supp. 3d at 1258; *see Marx v.*
24

1 *Gen. Revenue Corp.*, 568 U.S. 371, 386 (2103) (“[T]he canon against surplusage is strongest
2 when an interpretation would render superfluous another part of the same statutory scheme.”).
3 This statutory structure demonstrates that Congress did not intend to make § 1226(a)
4 inapplicable to all inadmissible noncitizens but rather viewed it as the default bond provision for
5 people arrested within the United States.

6 55. By contrast, § 1225(b) applies to people arriving at U.S. ports of entry or who
7 recently entered the United States. The statute’s entire framework is premised on inspections at
8 the border of people who are “seeking admission” to the United States. 8 U.S.C.
9 § 1225(b)(2)(A). Indeed, the Supreme Court has explained that this mandatory detention scheme
10 applies “at the Nation’s borders and ports of entry, where the Government must determine
11 whether a[] [noncitizen] seeking to enter the country is admissible.” *Jennings v. Rodriguez*, 583
12 U.S. 281, 287 (2018).

13 56. The BIA’s interpretation “would render the phrase ‘seeking admission’ in 8
14 U.S.C. § 1225(b)(2)(A) mere surplusage.” *Lopez Benitez*, 2025 WL 2371588, at *6. That section
15 applies to people who are (1) applicants for admission; (2) seeking admission; and (3) not clearly
16 and beyond a doubt entitled to be admitted. 8 U.S.C. § 1225(b)(2)(A); *Lopez Benitez*, 2025 WL
17 2371588, at *6; *Diaz Martinez*, 2025 WL 2084238, at *2. The BIA’s interpretation makes all
18 applicants for admission subject to mandatory detention, leaving the “seeking admission”
19 criterion unnecessary and violating the rule against surplusage. *Lopez Benitez*, 2025 WL
20 2371588, at *6; *Diaz Martinez*, 2025 WL 2084238, at *6.

21 57. Instead, the phrase “seeking admission” indicates that § 1225(b)(2)(A) applies to
22 people who are taking “some sort of present-tense action,” in other words, coming or attempting
23 to come into the United States. *Diaz Martinez*, 2025 WL 2084238, at *6; *see also Matter of M-C-*
24

1 *D-V-*, 28 I&N Dec. 18, 23 (BIA 2020) (stating that “the use of the present progressive tense . . .
2 denotes an ongoing process”). Therefore, § 1226(a), not § 1225(b)(2)(A), governs the detention
3 of people detained within the United States who are not actively seeking admission, as required
4 by the statute.

5 58. Immigration officials and the Department of Justice (DOJ) have long taken the
6 position that immigration officials have broad discretion not to apply the detention and expedited
7 removal procedures § 1225(b), and whether to classify individuals encountered inside the United
8 States shortly after crossing the border as subject to § 1225(b) detention or § 1226(a) detention.
9 *See* Brief for Petitioners at 4-7 (No. 21-954), *Biden v. Texas*, 597 U.S. 785 (2022). The DOJ has
10 stated, “[t]he INA affords DHS multiple options for processing applications for admission,” and
11 that includes arrest and detention pursuant to § 1226(a). *See id.* at 4-5.

12 59. Finally, as discussed below, the BIA’s interpretation of § 1225(b)(2)(A) to
13 mandate detention without a bond hearing for all noncitizens present in the United States without
14 having been admitted presents serious constitutional concerns. Therefore, to the degree that the
15 statute remains ambiguous, the Court should presume that Congress “did not intend the
16 alternative which raises serious constitutional doubts” and reject that construction. *Clark v.*
17 *Martinez*, 543 U.S. 371, 381-82 (2005). Therefore, § 1226(a), which permits bond hearings, not
18 § 1225(b)(2)(A), which does not, governs the detention of people like Petitioner.

19 **II. The BIA’s Application of Mandatory Detention to Noncitizens Like Petitioner**
20 **Violates Substantive and Procedural Due Process**

21 60. “It is well established that the Fifth Amendment entitles [noncitizens] to due
22 process of law in deportation proceedings.” *Demore v. Kim*, 538 U.S. 510, 523 (2003) (quoting
23 *Reno v. Flores*, 507 U.S. 292, 306 (1993)). “Freedom from imprisonment—from government
24 custody, detention, or other forms of physical restraint—lies at the heart of the liberty” that the

1 Due Process Clause protects. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001); *see also id.* at 718
2 (Kennedy, J., dissenting) (“Liberty under the Due Process Clause includes protection against
3 unlawful or arbitrary personal restraint or detention.”). This fundamental due process protection
4 applies to all noncitizens within the United States, including both removable and inadmissible
5 noncitizens. *See id.* at 693; *Plyler v. Doe*, 457 U.S. 202, 212 (1982); *Wong Wing v. United States*,
6 163 U.S. 228, 238 (1896).

7 61. Absent adequate procedural protections, substantive due process requires a
8 “special justification” that “outweighs the individual’s constitutionally protected interest in
9 avoiding physical restraint.” *Zadvydas*, 533 U.S. at 690; *accord, e.g., Torralba v. Knight*, No.
10 2:25-cv-1366, 2025 WL 2581792, at *12 (D. Nev. Sept. 5, 2025) (describing the standard for a
11 substantive due process violation); *Fernandez v. Lyons*, No. 8:25-cv-506, 2025 WL 2531539, at
12 *4 (D. Neb. Sept. 3, 2025) (same). In the immigration context, the Supreme Court has
13 recognized only two valid purposes for civil detention—to mitigate the risks of danger to the
14 community and to prevent flight. *Id.*; *Demore*, 538 U.S. at 528. Thus, to withstand constitutional
15 scrutiny, the nature and duration of mandatory immigration detention must be reasonably related
16 to these purposes.

17 62. In *Demore*, the Supreme Court upheld the constitutionality of § 1226(c) against a
18 facial challenge, specifically citing evidence that had been before Congress about noncitizens
19 with criminal convictions. 538 U.S. at 518-520. This justification does not apply, however, to
20 noncitizens with no criminal record whatsoever who have lived in the community for years. The
21 broad policy set forth in *Matter of Yajure Hurtado* is not reasonably related to the purposes of
22 prevent danger to the community or flight risk and violates substantive due process.

63. Additionally, procedural due process protects noncitizens against deprivation of liberty without adequate procedural protections, including notice and the opportunity to be heard. *A.A.R.P. v. Trump*, 145 S. Ct. 1364, 1367 (2025); *Trump v. J.G.G.*, 145 S. Ct. 1003, 1006 (2025); *Velasco Lopez v. Decker*, 978 F.3d 842, 851 (2d Cir. 2020). In determining the proper procedure to protect a detained noncitizen’s procedural due process rights under the Fifth Amendment, courts apply the three-part balancing test in *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976), weighing (1) “the private interest that will be affected by the official action;” (2) “the risk of an erroneous deprivation of such interest through the procedures used, and the probable value, if any, of additional or substitute procedural safeguards;” and (3) “the Government’s interest, including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail.” *Black v. Decker*, 103 F.4th 133, 147-48 (2d Cir. 2024); *Gayle v. Warden Monmouth C’ty Corr. Facility*, 12 F. 4th 321, 331 (3d Cir. 2021); *Hernandez-Lara*, 10 F.4th at 28; *Velasco Lopez*, 978 F.3d at 851 (all quoting *Mathews*, 424 U.S. at 335). Here, the BIA’s interpretation of the statute to require detention of all people in the United States without having been admitted deprives them of their liberty without any individualized process to determine whether such detention is necessary to prevent flight risk or danger to the community, and therefore violates due process.

64. First, the “importance and fundamental nature” of an individual’s liberty interest is well-established. *United States v. Salerno*, 481 U.S. 739, 750 (1987); *see also Ashley*, 288 F. Supp. at 670 (“[F]reedom from confinement is a liberty interest of the highest constitutional import.”). For people “who can face years of detention before resolution of their immigration proceedings, ‘the individual interest at stake is without doubt particularly important.’” *Linares Martinez v. Decker*, No. 18-cv-6527 (JMF), 2018 WL 5023946 at *3 (S.D.N.Y. Oct. 17, 2018).

1 65. Weighing this factor in *Velasco Lopez*, the Second Circuit found the private
2 interest to be “on any calculus, substantial,” observing that the petitioner, “could not maintain
3 employment or see his family or friends or others outside normal visiting hours. The use of a cell
4 phone was prohibited, and he had no access to the internet or email and limited access to the
5 telephone.” 978 F.3d at 851-52. Similarly, the First Circuit found a substantial private liberty
6 interest for the petitioner in *Hernandez-Lara*, noting that the petitioner there was incarcerated
7 “alongside criminal inmates” at a jail where “she was separated from her fiancé and unable to
8 maintain her employment.” 10 F.4th at 28.

9 66. Second, absent any individualized bond hearing, people will be detained despite
10 not being a danger to the community or a flight risk, because there is no mechanism to determine
11 whether their detention is necessary. *See, e.g., Günaydin v. Trump*, No. 25-cv-1151, 2025 WL
12 1459154, -- F. Supp. 3d --, at *8 (D. Minn. May 21, 2025) (noting that lack of consideration of
13 “individualized or particularized facts . . . increases the potential for erroneous deprivation of
14 individuals’ private rights”); *Ashley*, 28 F. Supp. 2d at 670 (finding a procedural due process
15 violation because “the Government has not proved that Petitioner presents an identified and
16 articulable threat to an individual or the community so as to justify his continued detention”). A
17 bond hearing would have significant value because it is designed to assess the individualized
18 facts of each case and determine whether less restrictive measures can fulfill the same goals.

19 67. Finally, the burden on the government of returning to the longstanding practice of
20 holding bond hearings for people like Petitioner does not outweigh the liberty interest at stake.
21 To the contrary, the government has an interest in “minimizing the enormous impact of
22 incarceration in cases where it serves no purpose.” *Velasco Lopez*, 978 F.3d at 854; *see also*
23 *Hernandez-Lara*, 10 F.4th at 33 (noting that “limiting the use of detention to only those
24

1 noncitizens who are dangerous or a flight risk may save the government, and therefore the
2 public, from expending substantial resources on needless detention”). Additionally, “unnecessary
3 detention imposes substantial societal costs. . . . The needless detention of those individuals thus
4 separates families and removes from the community breadwinners, caregivers, parents, siblings
5 and employees. Those ruptures in the fabric of communal life impact society in intangible ways
6 that are difficult to calculate in dollars and cents.” *Hernandez-Lara*, 10 F.4th at 33 (citation and
7 internal quotation marks omitted). The cost to the government and society of detaining people
8 unnecessarily for long periods of time is greater than the cost of providing individualized
9 hearings, and weighs in favor of additional procedural protections.

10 68. At these bond hearings, due process requires that the Government bear the burden
11 of proof by clear and convincing evidence. *See Gayle*, 12 F.4th at 332 (“[W]hen such a severe
12 deprivation is at issue, the Government must bear the burden of proof.”). “A standard of proof
13 serves to allocate the risk of error between the litigants and reflects the relative importance
14 attached to the ultimate decision.” *German Santos v. Warden Pike C’ty Corr. Facility*, 965 F.3d
15 203, 213 (citing *Addington v. Texas*, 441 U.S. 418, 423 (1979)). Therefore, when the Third
16 Circuit has ordered a constitutionally required bond hearing, it is placed the burden on the
17 government by clear and convincing evidence. *German Santos*, 965 F.3d at 214; *Guerrero-*
18 *Sanchez v. Warden York C’ty Prison*, 905 F.3d 208, 224 & n.12 (3d Cir. 2018), *abrogated on*
19 *other grounds by Johnson v. Arteaga-Martinez*, 596 U.S. 572 (2022). Other circuit courts have
20 similarly held that due process requires this allocation of the burden in bond hearings for
21 noncitizens like petitioner, who were then detained under § 1226(a). *Hernandez-Lara*, 10 F.4th
22 at 39-40; *Velasco Lopez*, 978 F.3d at 855-56. Thus, even if the statute requires detention without
23
24

1 a bond hearing, due process requires a hearing at which the government bears the burden by
2 clear and convincing evidence.

3 69. Once released from immigration custody, due process requires that a person like
4 Petitioner receive a hearing before a neutral decisionmaker to determine whether any re-
5 detention is justified, and whether the person is a flight risk or danger to the community.

6 70. Consistent with this principle, individuals released on parole or other forms of
7 conditional release have a liberty interest in their “continued liberty.” *Morrissey v. Brewer*, 408
8 U.S. 471, 482 (1972).

9 71. Such liberty is protected by the Fifth Amendment because, “although
10 indeterminate, [it] includes many of the core values of unqualified liberty,” such as the ability to
11 be gainfully employed and live with family, “and its termination inflicts a ‘grievous loss’ on the
12 [released individual] and often on others.” *Id.*

13 72. To guarantee against arbitrary re-detention and to guarantee the right to liberty,
14 due process requires “adequate procedural protections” that ensure the government’s asserted
15 justification for a noncitizen’s physical confinement “outweighs the individual’s constitutionally
16 protected interest in avoiding physical restraint.” *Zadvydas*, 533 U.S. at 690 (citation modified).

17 73. Due process thus guarantees notice and an individualized hearing before a neutral
18 arbitrator to assess danger or flight risk before the revocation of an individual’s release.
19 *Goldberg v. Kelly*, 397 U.S. 254, 267 (1970) (“The fundamental requisite of due process of law
20 is the opportunity to be heard at a meaningful time in a meaningful manner.” (citation
21 modified)); see also, e.g., *Morrissey*, 408 U.S. at 485 (requiring “preliminary hearing to
22 determine whether there is probable cause or reasonable ground to believe that the arrested
23
24

1 parolee has committed ... a violation of parole conditions” and that such determination be made
2 by someone not directly involved in the case.” (citation modified)).

3 74. Several courts have recognized that these principles apply with respect to the re-
4 detention of the many noncitizens that DHS has begun taking back into custody, often after such
5 persons have been released for months and years.

6 75. In *E.A. T.-B.*, the district court in the Western District of Washington applied the
7 test set forth in *Mathews v. Eldridge* to hold that even in a case where the government argued
8 mandatory detention applied, a person’s re-detention required a hearing and that the petitioner
9 had “undoubtedly [been] deprive[d] ... of an established interest in his liberty.” *E.A. T.-B. v.*
10 *Wamsley*, No. 25-cv-1192, 2025 WL 2402130, at *3 (W.D. Washington). The Court further
11 explained that even if detention was mandatory, the risk of erroneous deprivation of liberty
12 without a hearing was high because a hearing serves to ensure that the purposes of detention—
13 the prevention of danger and flight risk—are properly served. *Id.* at *4–5.

14 76. Finally, the Court explained that “the Government’s interest in re-detaining non-
15 citizens previously released without a hearing is low: although it would have required the
16 expenditure of finite resources (money and time) to provide Petitioner notice and hearing on
17 [ISAP] violations before arresting and re-detaining him, those costs are far outweighed by the
18 risk of erroneous deprivation of the liberty interest at issue.” *Id.* at *5. As a result, this Court
19 ordered the petitioner’s immediate release. *Id.* at *6.

20 77. The decision in *E.A. T.-B.* is consistent with many other district court decisions
21 addressing similar situations. *See, e.g., Valdez v. Joyce*, No. 25 CIV. 4627 (GBD), 2025 WL
22 1707737 (S.D.N.Y. June 18, 2025) (ordering immediate release due to lack of pre-deprivation
23 hearing); *Pinchi v. Noem*, --- F. Supp. 3d ---, No. 5:25-CV-05632-PCP, 2025 WL 2084921 (N.D.

Cal. July 24, 2025) (similar); *Maklad v. Murray*, No. 1:25-CV-00946 JLT SAB, 2025 WL 2299376 (E.D. Cal. Aug. 8, 2025) (similar); *Garcia v. Andrews*, No. 1:25-CV-01006 JLT SAB, 2025 WL 2420068 (E.D. Cal. Aug. 21, 2025) (similar); *Mata Velasquez v. Kurzdorfer*, --- F.Supp.3d ----, 2025 WL 1953796, *17 (W.D.N.Y. July 16, 2025) (detention of parolee without a reasoned explanation or changed circumstances and without a meaningful opportunity to be heard violates due process); *Rodriguez Cabrera v. Mattos*, 2025 WL 3072687 (D Nev. Nov. 3, 2025); *Fernandez Lopez v. Wofford*, 2025 WL 2959319, *4 (E.D. Ca. Oct. 17, 2025) (unpub) (finding a non-citizen granted parole at the border has a liberty interest in her conditional release and that such a parolee has a implicit right entitlement to remain at liberty if she complies with the conditions of her parole); *Noori v. Larose*, 2025 WL 2800149, *10 (S.D. Ca. Oct. 1, 2025) (unpub) (parolee developed a private interest in remaining free in the one year he has resided in the United States since entry); *Munoz Materano v. Arteta*, 2025 WL 2630826, *13 (S.D.N.Y. Sept. 12, 2025) (unpub); *Ramirez Tesara v. Wamsley*, --- F.Supp.3d ----, 2025 WL 2637663, *3 (W.D. Wash. Sept. 12, 2025) (finding that parolee's liberty interest did not expire with his parole agreement); *see also Y-Z-L-H- v. Bostock*, --- F.Supp.3d ----, 2025 WL 1898025, *14 (D. Ore. July 9, 2025) (finding detention of a parolee who had not completed his asylum process to be arbitrary and capricious and ordering immediate release).

78. The same framework and principles apply here and compel Petitioner's immediate release.

CLAIMS FOR RELIEF

COUNT I Violation of the INA

79. Petitioner incorporates by reference the allegations of fact set forth in the preceding paragraphs.

1 agencies explained that “[d]espite being applicants for admission, [noncitizens] who are present
2 without having been admitted or paroled (formerly referred to as [noncitizens] who entered
3 without inspection) will be eligible for bond and bond redetermination.” 62 Fed. Reg. at 10323
4 (emphasis added). The agencies thus made clear that individuals who had entered without
5 inspection were eligible for consideration for bond and bond hearings before IJs under 8 U.S.C. §
6 1226 and its implementing regulations.

7 86. Nonetheless, pursuant to *Matter of Yajure Hurtado*, EOIR has a policy and
8 practice of applying § 1225(b)(2) to individual like Petitioner.

9 87. The regulation at 8 C.F.R. § 1003.19 lays out bond procedures, and
10 § 1003.19(h)(2) delineates categories of noncitizens who are subject to mandatory detention and
11 not entitled to a bond hearing. The fact that noncitizens within the United States who are subject
12 to inadmissibility grounds are not included on this list shows that the agencies did not intend
13 them to be subject to mandatory detention. The BIA’s interpretation thus violates the regulations
14 and unlawfully denies Petitioner a bond hearing.

15 88. The application of § 1225(b)(2) to Petitioner unlawfully mandates his continued
16 detention and violates 8 C.F.R. §§ 236.1, 1236.1, and 1003.19.

17 **COUNT III**
18 **Violation of Substantive Due Process under the Fifth Amendment**

19 89. Petitioner repeats, re-alleges, and incorporates by reference each and every
20 allegation in the preceding paragraphs as if fully set forth herein.

21 90. The government may not deprive a person of life, liberty, or property without due
22 process of law. U.S. Const. amend. V. “Freedom from imprisonment—from government
23 custody, detention, or other forms of physical restraint—lies at the heart of the liberty that the
24 Clause protects.” *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001). Substantive due process requires

1 that immigration detention without a bond hearing be reasonably related to the goals of ensuring
 2 the appearance of noncitizens at future proceedings and preventing danger to the community.
 3 *Zadvydas*, 533 U.S. at 690.

4 91. The BIA's application of mandatory detention under § 1225(b)(2) is not
 5 reasonably related to those goals and thus violates substantive due process. Petitioner has a
 6 fundamental interest in liberty and being free from official restraint. Petitioner has routinely
 7 appeared at ICE for his check-ins since his arrival in the United States, has never missed a
 8 required check-in, interview, or court hearing, and has kept his address updated with ICE and the
 9 immigration court. He has also never been criminally arrested anywhere in the world, and there
 10 is no evidence his release would pose a danger to the community.

11 92. The government's detention of Petitioner without a bond redetermination hearing
 12 to determine whether he is a flight risk or danger to others violates his right to due process.

13 **COUNT IV**

14 **Violation of Procedural Due Process under the Fifth Amendment**

15 93. Petitioner re-alleges and incorporates by reference the above paragraphs.

16 94. The Due Process Clause of the Fifth Amendment forbids the government from
 17 depriving any "person" of liberty "without due process of law." U.S. Const. amend. V. Courts
 18 apply the *Mathews v. Eldridge* balancing test to determine what procedures the due process
 19 clause requires. *Gayle*, 12 F.4th at 331.

20 95. The first factor is the private interest that will be affected by the official action. *Id.*
 21 Here, the deprivation of Petitioner's liberty is a particularly weighty interest. It is well
 22 established that individuals have a liberty interest in their continued liberty and freedom from
 23 restraint. *Salerno*, 481 U.S. at 750; *see also Ashley*, 288 F. Supp. at 670. This is especially true
 24 given the fact that Petitioner was already determined to not be a danger to the community or a

1 risk of flight when he was initially paroled from ICE detention. He relied on this interest in his
2 liberty by finding gainful employment, renting a house to live in, and becoming a value member
3 of his community. This freedom from unlawful restraint is the heart of the liberty interest
4 protected by the Fifth Amendment.

5 96. The second factor is the risk of erroneous deprivation of such interest through the
6 procedures used, and the probable value, if any, of additional safeguards. *Id.* Here, there is a
7 great risk of unnecessary detention because the BIA's interpretation of the statute does not
8 permit any individualized determination of whether detention during removal proceedings is
9 necessary. *See Ashley*, 288 F. Supp. 2d at 670. At a hearing, Petitioner could show that his
10 detention is not necessary because he is not a danger to the community and is not a flight risk.
11 He has appeared for all required check-ins, appointments, and hearings since his arrival in the
12 United States, has relief pending before the court, and has never been criminally arrested thus
13 poses no danger to the community. A hearing at which the government bears the burden of proof
14 by clear and convincing evidence would protect the substantial liberty interest at stake. *German*
15 *Santos*, 965 F.3d at 213-14.

16 97. The final factor is the Government's interest. *Gayle*, 12 F.4th at 331. The
17 government has no legitimate interest in detaining Petitioner when detention is not necessary to
18 ensure appearance at future hearings or protect the community, and less restrictive measures like
19 continued ICE check-ins or a reasonable bond would serve those purposes. *Hernandez-Lara*, 10
20 F.4th at 32-33; *see Ousman D. v. Decker*, No. 20-9646, 2020 WL 5587441, at *4 (holding that
21 due process requires consideration of less restrictive alternatives to detention that would address
22 the government's legitimate purpose); *Hechavarria v. Whitaker*, 358 F. Supp. 3d 227, 241-42
23 (W.D.N.Y. 2019) (same). Therefore, the government does not have an interest in detaining
24

1 Petitioner without a bond hearing that outweighs his substantial liberty interest in such an
2 individualized determination.

3 98. Due process does not permit the government to strip Petitioner of his liberty
4 without written notice and a hearing before a neutral decisionmaker to determine whether re-
5 detention is warranted based on danger or flight risk. *See Morrissey*, 408 U.S. at 487–88. Such
6 written notice and a hearing must occur *prior* to any re-detention.

7 99. Respondents revoked Petitioner’s release and deprived him of liberty without
8 providing him any written notice or meaningful opportunity to be heard by neutral
9 decisionmaker prior to his re-detention.

10 100. Accordingly, Petitioner’s re-detention without any hearing to determine whether
11 that detention is necessary violates the Due Process clause of the Fifth Amendment and warrants
12 his immediate release from detention without the need for a bond hearing.

13 **PRAYER FOR RELIEF**

14 WHEREFORE, Petitioner prays that this Court grant the following relief:

- 15 a. Assume jurisdiction over this matter;
- 16 b. Order that Petitioner shall not be transferred outside the Eastern District of
17 Pennsylvania while this habeas petition is pending;
- 18 c. Order that the Petitioner not be ordered removed from United States during the
19 pendency of these proceedings;
- 20 d. Issue an Order to Show Cause ordering Respondents to show cause why this
21 Petition should not be granted within three days;
- 22 e. Issue a Writ of Habeas Corpus requiring that Respondents release Petitioner from
23 custody immediately and permanently enjoining his re-detention absent written
24

1 notice and a hearing prior to re-detention where Respondents must prove by clear
2 and convincing evidence that he is a flight risk or danger to the community and
3 that no alternatives to detention would mitigate those risks, or, in the alternative,
4 provide Petitioner with a bond hearing pursuant to 8 U.S.C. § 1226(a) within
5 seven days;

6 f. Declare that Petitioner is detained pursuant to 8 U.S.C. § 1226(a);

7 g. Declare that Petitioner's detention violates the Immigration and Nationality Act
8 and/or the Due Process Clause of the Fifth Amendment to the U.S. Constitution;

9 h. Award Petitioner attorney's fees and costs under the Equal Access to Justice Act
10 ("EAJA"), as amended, 28 U.S.C. § 2412, and on any other basis justified under
11 law;

12 i. Issue an Order that Respondents, upon Petitioner's release, are required to return
13 Petitioner's identity documents, including his Employment Authorization
14 Document (EAD), Pennsylvania ID, Social Security Card, and any other
15 document that he had on his possession when detained;

16 j. Grant any other and further relief that this Court deems just and proper.

17 **VERIFICATION BY SOMEONE ACTING ON PETITIONER'S BEHALF PURSUANT**
18 **TO 28 U.S.C. § 2242**

19 I am submitting this verification on behalf of the Petitioner because I am one of Petitioner's
20 attorneys, and I have discussed the claims with Petitioner's legal team. Based on those discussions,
21 I hereby verify that the statements made in the attached Petition for Writ of Habeas Corpus are
22 true and correct to the best of my knowledge.

1 DATED this 17th of March 2026.

2 /s/ Erin O'Brien
3 Erin O'Brien, Esq. (PA 332093)
4 Global Immigration Legal Team
5 150 Strafford Avenue, Suite 115
6 Wayne, PA 19087
7 Telephone: 610-975-4599
8 Fax: 610-687-2100
9 E-mail: erin@giltlaw.com

10 *Attorney for Petitioner*
11
12
13
14
15
16
17
18
19
20
21
22
23
24

Erin O'Brien, Esq.
Global Immigration Legal Team, LLC
150 Strafford Avenue, Suite 115
Wayne, PA 19087
p. 610-975-4599
f. 610-687-2100
erin@giltlaw.com

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

MANOJ MANOJ

v.

RIFE, ET AL.

Case No. 2:26-cv-1742

**PETITION FOR WRIT OF
HABEAS CORPUS**

EXHIBIT LIST

<u>Exhibit</u>		<u>Page</u>
A.	Notice to Appear, dated February 1, 2024, stating Petitioner is an alien present without admission or parole;	1-3
B.	Printout of ICE Detainee Locator, evincing Petitioner is housed at the Federal Detention Center in Philadelphia, PA;	4
C.	Appendix of District Court Cases having heard this issue.	5-18

JS 44 (Rev. 04/21)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Manoj MANOJ

(b) County of Residence of First Listed Plaintiff Philadelphia, PA
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Global Immigration Legal Team
150 Srafford Ave Suite 115, Wayne, PA
19087, 610-975-4599

DEFENDANTS John Rife, Acting Field Office Director
ICE/ERO Philadelphia; Kristi NOEM, Sec. of
DHS; DHS; Pam Bondi, Atty Gen; EOIR; Jama
LAWRENCE, Warden of Federal Detention Center
County of Residence of First Listed Defendant Philadelphia
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | ☐ 1 | ☐ 1 | Incorporated or Principal Place of Business In This State | ☐ 4 | ☐ 4 |
| Citizen of Another State | ☐ 2 | ☐ 2 | Incorporated and Principal Place of Business In Another State | ☐ 5 | ☐ 5 |
| Citizen or Subject of a Foreign Country | ☐ 3 | ☐ 3 | Foreign Nation | ☐ 6 | ☐ 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
☐ 110 Insurance ☐ 120 Marine ☐ 130 Miller Act ☐ 140 Negotiable Instrument ☐ 150 Recovery of Overpayment & Enforcement of Judgment ☐ 151 Medicare Act ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans) ☐ 153 Recovery of Overpayment of Veteran's Benefits ☐ 160 Stockholders' Suits ☐ 190 Other Contract ☐ 195 Contract Product Liability ☐ 196 Franchise	PERSONAL INJURY ☐ 310 Airplane ☐ 315 Airplane Product Liability ☐ 320 Assault, Libel & Slander ☐ 330 Federal Employers' Liability ☐ 340 Marine ☐ 345 Marine Product Liability ☐ 350 Motor Vehicle ☐ 355 Motor Vehicle Product Liability ☐ 360 Other Personal Injury ☐ 362 Personal Injury - Medical Malpractice	☐ 365 Personal Injury - Product Liability ☐ 367 Health Care/Pharmaceutical Personal Injury Product Liability ☐ 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY ☐ 370 Other Fraud ☐ 371 Truth in Lending ☐ 380 Other Personal Property Damage ☐ 385 Property Damage Product Liability	☐ 625 Drug Related Seizure of Property 21 USC 881 ☐ 690 Other LABOR ☐ 710 Fair Labor Standards Act ☐ 720 Labor/Management Relations ☐ 740 Railway Labor Act ☐ 751 Family and Medical Leave Act ☐ 790 Other Labor Litigation ☐ 791 Employee Retirement Income Security Act IMMIGRATION ☐ 462 Naturalization Application ☐ 465 Other Immigration Actions	☐ 422 Appeal 28 USC 158 ☐ 423 Withdrawal 28 USC 157 INTEL LECTUAL PROPERTY RIGHTS ☐ 820 Copyrights ☐ 830 Patent ☐ 835 Patent - Abbreviated New Drug Application ☐ 840 Trademark ☐ 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY ☐ 861 HIA (1395ff) ☐ 862 Black Lung (923) ☐ 863 DIWC/DIWW (405(g)) ☐ 864 SSID Title XVI ☐ 865 RSI (405(g)) FEDERAL TAX SUITS ☐ 870 Taxes (U.S. Plaintiff or Defendant) ☐ 871 IRS—Third Party 26 USC 7609
REAL PROPERTY ☐ 210 Land Condemnation ☐ 220 Foreclosure ☐ 230 Rent Lease & Ejectment ☐ 240 Torts to Land ☐ 245 Tort Product Liability ☐ 290 All Other Real Property	CIVIL RIGHTS ☐ 440 Other Civil Rights ☐ 441 Voting ☐ 442 Employment ☐ 443 Housing/Accommodations ☐ 445 Amer. w/Disabilities - Employment ☐ 446 Amer. w/Disabilities - Other ☐ 448 Education	PRISONER PETITIONS Habeas Corpus: ☐ 463 Alien Detainee ☐ 510 Motions to Vacate Sentence ☐ 530 General ☐ 535 Death Penalty Other: ☐ 540 Mandamus & Other ☐ 550 Civil Rights ☐ 555 Prison Condition ☐ 560 Civil Detainee - Conditions of Confinement	☐ 424 Appeal 28 USC 158 ☐ 423 Withdrawal 28 USC 157 ☐ 820 Copyrights ☐ 830 Patent ☐ 835 Patent - Abbreviated New Drug Application ☐ 840 Trademark ☐ 880 Defend Trade Secrets Act of 2016 ☐ 861 HIA (1395ff) ☐ 862 Black Lung (923) ☐ 863 DIWC/DIWW (405(g)) ☐ 864 SSID Title XVI ☐ 865 RSI (405(g)) ☐ 870 Taxes (U.S. Plaintiff or Defendant) ☐ 871 IRS—Third Party 26 USC 7609	☐ 375 False Claims Act ☐ 376 Qui Tam (31 USC 3729(a)) ☐ 400 State Reapportionment ☐ 410 Antitrust ☐ 430 Banks and Banking ☐ 450 Commerce ☐ 460 Deportation ☐ 470 Racketeer Influenced and Corrupt Organizations ☐ 480 Consumer Credit (15 USC 1681 or 1692) ☐ 485 Telephone Consumer Protection Act ☐ 490 Cable/Sat TV ☐ 850 Securities/Commodities/Exchange ☐ 890 Other Statutory Actions ☐ 891 Agricultural Acts ☐ 893 Environmental Matters ☐ 895 Freedom of Information Act ☐ 896 Arbitration ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision ☐ 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

28 USC 2241

Brief description of cause:

Habeas Corpus challenging detention of noncitizen

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND:

☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

3/17/2026

Erin OBrien

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

10/2024

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DESIGNATION FORM

Place of Accident, Incident, or Transaction: Philadelphia, PA

RELATED CASE IF ANY: Case Number: _____ Judge: _____

- | | |
|---|------------------------------|
| 1. Does this case involve property included in an earlier numbered suit? | Yes ☐ |
| 2. Does this case involve a transaction or occurrence which was the subject of an earlier numbered suit? | Yes ☐ |
| 3. Does this case involve the validity or infringement of a patent which was the subject of an earlier numbered suit? | Yes ☐ |
| 4. Is this case a second or successive habeas corpus petition, social security appeal, or pro se case filed by the same individual? | Yes ☐ |
| 5. Is this case related to an earlier numbered suit even though none of the above categories apply?
If yes, attach an explanation. | Yes ☐ |

I certify that, to the best of my knowledge and belief, the within case ☐ is / ☒ **is not** related to any pending or previously terminated action in this court.

Civil Litigation Categories

A. Federal Question Cases:

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts)
- ☐ 2. FELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Wage and Hour Class Action/Collective Action
- ☐ 6. Patent
- ☐ 7. Copyright/Trademark
- ☐ 8. Employment
- ☐ 9. Labor-Management Relations
- ☐ 10. Civil Rights
- ☒ 11. Habeas Corpus
- ☐ 12. Securities Cases
- ☐ 13. Social Security Review Cases
- ☐ 14. Qui Tam Cases
- ☐ 15. Cases Seeking Systemic Relief ***see certification below***
- ☐ 16. All Other Federal Question Cases. (Please specify): _____

B. Diversity Jurisdiction Cases:

- ☐ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☐ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☐ 5. Motor Vehicle Personal Injury
- ☐ 6. Other Personal Injury (Please specify): _____
- ☐ 7. Products Liability
- ☐ 8. All Other Diversity Cases: (Please specify) _____

I certify that, to the best of my knowledge and belief, that the remedy sought in this case ☐ **does** / ☒ **does not** have implications beyond the parties before the court and ☐ **does** / ☒ **does not** seek to bar or mandate statewide or nationwide enforcement of a state or federal law including a rule, regulation, policy, or order of the executive branch or a state or federal agency, whether by declaratory judgment and/or any form of injunctive relief.

ARBITRATION CERTIFICATION (CHECK ONLY ONE BOX BELOW)

I certify that, to the best of my knowledge and belief:

☒ Pursuant to Local Civil Rule 53.2(3), this case is not eligible for arbitration either because (1) it seeks relief other than money damages; (2) the money damages sought are in excess of \$150,000 exclusive of interest and costs; (3) it is a social security case, includes a prisoner as a party, or alleges a violation of a right secured by the U.S. Constitution, or (4) jurisdiction is based in whole or in part on 28 U.S.C. § 1343.

☐ None of the restrictions in Local Civil Rule 53.2 apply and this case is eligible for arbitration.

NOTE: A trial de novo will be by jury only if there has been compliance with F.R.C.P. 38.

DEPARTMENT OF HOMELAND SECURITY
NOTICE TO APPEAR

In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID: [REDACTED]

FINS

DOB: [REDACTED]

File No: [REDACTED]

Event No: [REDACTED]

In the Matter of:

Respondent:

MANOJ MANOJ

currently residing at:

[REDACTED] PENNSYLVANIA, 19148-4021

+1 [REDACTED]

(Number, street, city, state and ZIP code)

(Area code and phone number)

- ☐ You are an arriving alien.
- ☒ You are an alien present in the United States who has not been admitted or paroled.
- ☐ You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

1. You are not a citizen or national of the United States;
2. You are a native of INDIA and a citizen of INDIA ;
3. You arrived in the United States at or near OTAY MESA, CA , on or about January 31, 2024 ;
4. You were not then admitted or paroled after inspection by an Immigration Officer.

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

212(a) (6) (A) (i) of the Immigration and Nationality Act, as amended, in that you are an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General.

- ☐ This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.
- ☐ Section 235(b)(1) order was vacated pursuant to: ☐ 8CFR 208.30 ☐ 8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

900 MARKET STREET, SUITE 504 PHILADELPHIA PA 19107

(Complete Address of Immigration Court, including Room Number, if any)

on January 13, 2026 at 01:00 PM to show why you should not be removed from the United States based on the

(Date)

(Time)

charge(s) set forth above.

Acting/Patrol Agent in Charge

MICHAEL A RICHES

Date: 2024.02.01 12:03:52 -05:00

0983399309.CBP

(Signature and Title of Issuing Officer)

Date: February 01, 2024

San Diego, California

(City and State)

EOIR - 1 of 3

Notice to Respondent

Warning: Any statement you make may be used against you in removal proceedings.

Alien Registration: This copy of the Notice to Appear served upon you is evidence of your alien registration while you are in removal proceedings. You are required to carry it with you at all times.

Representation: If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review, pursuant to 8 CFR 1003.16. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this notice.

Conduct of the hearing: At the time of your hearing, you should bring with you any affidavits or other documents that you desire to have considered in connection with your case. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing. At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the Notice to Appear, including that you are inadmissible or removable. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the immigration judge. You will be advised by the immigration judge before whom you appear of any relief from removal for which you may appear eligible including the privilege of voluntary departure. You will be given a reasonable opportunity to make any such application to the immigration judge.

One-Year Asylum Application Deadline: If you believe you may be eligible for asylum, you must file a Form I-589, Application for Asylum and for Withholding of Removal. The Form I-589, Instructions, and information on where to file the Form can be found at www.uscis.gov/i-589. Failure to file the Form I-589 within one year of arrival may bar you from eligibility to apply for asylum pursuant to section 208(a)(2)(B) of the Immigration and Nationality Act.

Failure to appear: You are required to provide the Department of Homeland Security (DHS), in writing, with your full mailing address and telephone number. You must notify the Immigration Court and the DHS immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the DHS.

Mandatory Duty to Surrender for Removal: If you become subject to a final order of removal, you must surrender for removal to your local DHS office, listed on the internet at <http://www.ice.gov/contact/ero>, as directed by the DHS and required by statute and regulation. Immigration regulations at 8 CFR 1241.1 define when the removal order becomes administratively final. If you are granted voluntary departure and fail to depart the United States as required, fail to post a bond in connection with voluntary departure, or fail to comply with any other condition or term in connection with voluntary departure, you must surrender for removal on the next business day thereafter. If you do not surrender for removal as required, you will be ineligible for all forms of discretionary relief for as long as you remain in the United States and for ten years after your departure or removal. This means you will be ineligible for asylum, cancellation of removal, voluntary departure, adjustment of status, change of nonimmigrant status, registry, and related waivers for this period. If you do not surrender for removal as required, you may also be criminally prosecuted under section 243 of the Immigration and Nationality Act.

U.S. Citizenship Claims: If you believe you are a United States citizen, please advise the DHS by calling the ICE Law Enforcement Support Center toll free at (855) 448-6903.

Sensitive locations: To the extent that an enforcement action leading to a removal proceeding was taken against Respondent at a location described in 8 U.S.C. § 1229(e)(1), such action complied with 8 U.S.C. § 1367.

Request for Prompt Hearing

To expedite a determination in my case, I request this Notice to Appear be filed with the Executive Office for Immigration Review as soon as possible. I waive my right to a 10-day period prior to appearing before an immigration judge and request my hearing be scheduled.

Before:

 (Signature of Respondent)

Date: _____

 (Signature and Title of Immigration Officer)

Certificate of Service

This Notice To Appear was served on the respondent by me on February 01, 2024, in the following manner and in compliance with section 239(a)(1) of the Act.

- ☒ in person ☐ by certified mail, returned receipt # _____ requested ☐ by regular mail
☐ Attached is a credible fear worksheet.
☒ Attached is a list of organization and attorneys which provide free legal services.

The alien was provided oral notice in the HINDI language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

Merned
 (Signature of Respondent if Personally Served)

JOHN A. KULAKOWSKI, BORDER
 PATROL AGENT

JOHN A KULAKOWSKI
 Date: 2024.02.01 09:25:17 -08:00
 0316055718 CBP
 (Signature and Title of officer)

Privacy Act Statement

Authority:

The Department of Homeland Security through U.S. Immigration and Customs Enforcement (ICE), U.S Customs and Border Protection (CBP), and U.S. Citizenship and Immigration Services (USCIS) are authorized to collect the information requested on this form pursuant to Sections 103, 237, 239, 240, and 290 of the Immigration and Nationality Act (INA), as amended (8 U.S.C. 1103, 1229, 1229a, and 1360), and the regulations issued pursuant thereto.

Purpose:

You are being asked to sign and date this Notice to Appear (NTA) as an acknowledgement of personal receipt of this notice. This notice, when filed with the U.S. Department of Justice's (DOJ) Executive Office for Immigration Review (EOIR), initiates removal proceedings. The NTA contains information regarding the nature of the proceedings against you, the legal authority under which proceedings are conducted, the acts or conduct alleged against you to be in violation of law, the charges against you, and the statutory provisions alleged to have been violated. The NTA also includes information about the conduct of the removal hearing, your right to representation at no expense to the government, the requirement to inform EOIR of any change in address, the consequences for failing to appear, and that generally, if you wish to apply for asylum, you must do so within one year of your arrival in the United States. If you choose to sign and date the NTA, that information will be used to confirm that you received it, and for recordkeeping.

Routine Uses:

For United States Citizens, Lawful Permanent Residents, or individuals whose records are covered by the Judicial Redress Act of 2015 (5 U.S.C. § 552a note), your information may be disclosed in accordance with the Privacy Act of 1974, 5 U.S.C. § 552a(b), including pursuant to the routine uses published in the following DHS systems of records notices (SORN): DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, DHS/USCIS-007 Benefit Information System, DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER), and DHS/ICE-003 General Counsel Electronic Management System (GEMS), and DHS/CBP-023 Border Patrol Enforcement Records (BPER). These SORNs can be viewed at <https://www.dhs.gov/system-records-notices-sorn>. When disclosed to the DOJ's EOIR for immigration proceedings, this information that is maintained and used by DOJ is covered by the following DOJ SORN: EOIR-001, Records and Management Information System, or any updated or successor SORN, which can be viewed at <https://www.justice.gov/opcl/doj-systems-records>. Further, your information may be disclosed pursuant to routine uses described in the abovementioned DHS SORNs or DOJ EOIR SORN to federal, state, local, tribal, territorial, and foreign law enforcement agencies for enforcement, investigatory, litigation, or other similar purposes.

For all others, as appropriate under United States law and DHS policy, the information you provide may be shared internally within DHS, as well as with federal, state, local, tribal, territorial, and foreign law enforcement; other government agencies; and other parties for enforcement, investigatory, litigation, or other similar purposes.

Disclosure:

Providing your signature and the date of your signature is voluntary. There are no effects on you for not providing your signature and date; however, removal proceedings may continue notwithstanding the failure or refusal to provide this information.

APPENDIX

FIRST CIRCUIT

District of Maine

1. Chogllo Chafla v. Scott, No. 25-00437, 2025 WL 2688541 (D. Me. Sept. 22, 2025)
2. Chang Barrios v. Shepley, No. 25-00406, 2025 WL 2772579 (D. Me. Sept. 29, 2025)
3. Chiliquinga Yumbillo v. Stamper, No. 25-00479, 2025 WL 2783642 (D. Me. Sept. 30, 2025)
4. Aguilar Guerra v. Joyce, No. 25-00534, 2025 WL 2999042 (D. Me. Oct. 24, 2025)
5. Petion v. Hyde, No. 25-00535, 2025 WL 3072567 (D. Me. Nov. 3, 2025)

District of Massachusetts

6. Gomes v. Hyde, No. 25-11571, 2025 WL 1869299 (D. Mass. July 7, 2025)
7. Martinez v. Hyde, No. 25-11613, — F. Supp. 3d —, 2025 WL 2084238 (D. Mass. July 24, 2025)
8. dos Santos v. Lyons, No. 25-12052, 2025 WL 2370988 (D. Mass. Aug. 14, 2025)
9. Romero v. Hyde, No. 25-11631, — F. Supp. 3d —, 2025 WL 2403827 (D. Mass. Aug. 19, 2025)
10. Diaz Diaz v. Mattivelo, No. 25-12226, 2025 WL 2457610 (D. Mass. Aug. 27, 2025)
11. Doe v. Moniz, No. 25-12094, 2025 WL 2576819 (D. Mass. Sept. 5, 2025)

12. Encarnacion v. Moniz, No. 25-12237, Doc. No. 5 (D. Mass. Sept. 5, 2025)
13. Sampiao v. Hyde, No. 25-11981, 2025 WL 2607924 (D. Mass. Sept. 9, 2025)
14. Hilario Rodriguez v. Moniz, No. 12-12358, Doc. No. 22 (D. Mass. Sept. 18, 2025)
15. Locon Cordero v. Hyde, No. 25-12802, Doc. No. 15 (D. Mass. Sept. 28, 2025)
16. Inlago Tocagon v. Moniz, No. 25-12453, — F. Supp. 3d —, 2025 WL 2778023 (D. Mass. Sept. 29, 2025)
17. Romero-Nolasco v. McDonald, No. 25-12492, 2025 WL 2778036 (D. Mass. Sept. 29, 2025)
18. Romero-Nolasco v. McDonald, No. 25-12584, Doc. No. 9 (D. Mass. Oct. 2, 2025)
19. Elias Escobar v. Hyde, No. 25-12620, 2025 WL 2823324 (D. Mass. Oct. 3, 2025)
20. Guerrero Orellana v. Moniz, No. 25-12664, — F. Supp. 3d —, 2025 WL 2809996 (D. Mass. Oct. 3, 2025)
21. Pereira de Souza v. Hyde, No. 25-12532, Doc. No. 13 (D. Mass. Oct. 6, 2025)
22. de Andrade v. Moniz, No. 25-12455, 2025 WL 2841844 (D. Mass. Oct. 7, 2025)

23. de Los Reyes Gonzalez v. McDonald, No. 25-12644, Doc. No. 10 (D. Mass. Oct. 9, 2025)
24. Landaverde v. Hyde, No. 25-12552, Doc. No. 16 (D. Mass. Oct. 10, 2025)
25. Pineda-Chavez v. Hyde, No. 25-12932, Doc. No. 9 (D. Mass. Oct. 16, 2025)
26. Garcia Guaman v. Hyde, No. 25-12879, Doc. No. 7 (D. Mass. Oct. 17, 2025)
27. Nogueira da Silva v. Hyde, No. 25-12931, Doc. No. 10 (D. Mass. Oct. 17, 2025)
28. Lema Zamora v. Noem, No. 25-12750, 2025 WL 2958879 (D. Mass. Oct. 17, 2025)
29. Custodio de Souza v. Muniz, No. 25-12636, Doc. No. 14 (D. Mass. Oct. 18, 2025)
30. Hercules Acosta v. Hyde, No. 25-13011, Doc. No. 10 (D. Mass. Oct. 20, 2025)
31. Monzon v. Hyde, No. 25-12594, Doc. No. 15 (D. Mass. Oct. 20, 2025)
32. da Silva v. Bondi, No. 25-12672, 2025 WL 2969163 (D. Mass. Oct. 21, 2025)
33. Coelho Gomes v. Moniz, No. 25-13021, Doc. No. 8 (D. Mass. Oct. 22, 2025)
34. Cortez Rivera v. Hyde, No. 25-12390, 2025 WL 2977900 (D. Mass. Oct. 22, 2025)
35. Moreira Aguiar v. Moniz, No. 25-12706, 2025 WL 2987656 (D. Mass. Oct. 22, 2025)
36. Maza Maza v. Hyde, No. 25-13013, Doc. No. 8 (D. Mass. Oct. 23, 2025)
37. Cesario Souza v. Hyde, No. 25-12461, 2025 WL 2997670 (D. Mass. Oct. 24, 2025)
38. Chavez Castillo v. Moniz, No. 25-13091, Doc. No. 8 (D. Mass. Oct. 27, 2025)
39. de Moura v. Moniz, No. 25-13058, Doc. No. 10 (D. Mass. Oct. 27, 2025)
40. Mejia Arias v. Moniz, No. 25-13019, Doc. No. 8 (D. Mass. Oct. 27, 2025)
41. Zolakio v. Hyde, No. 25-13040, Doc. No. 8 (D. Mass. Oct. 28, 2025)
42. Ramirez Ramirez v. Moniz, No. 25-13048, Doc. No. 23 (D. Mass. Oct. 29, 2025)
43. Gamez Martinez v. Moniz, No. 25-13008, Doc. No. 8 (D. Mass. Oct. 30, 2025)
44. Zavala Rivera v. McDonald, No. 25-13070, Doc. No. 8 (D. Mass. Nov. 3, 2025)
45. de Souza Filho v. Hyde, No. 25-13207, Doc. No. 8 (D. Mass. Oct. 30, 2025)
46. Orrego Marin v. Moniz, No. 25-13032, Doc. No. 9 (D. Mass. Nov. 4, 2025)
47. Portillo Martinez, No. 25-11909, 2025 WL 3152847 (D. Mass. Nov. 12, 2025)

48. Anselmo v. Moniz, No. 25-13309, 2025 WL 3171137 (D. Mass. Nov. 13, 2025)
49. Caguana-Caguana v. Moniz, No. 25-13142, 2025 WL 3171043 (D. Mass. Nov. 13, 2025)

District of New Hampshire

50. Jimenez v. FCI Berlin, Warden, No. 25-00326, 2025 WL 2639390 (D.N.H. Sept. 8, 2025)
51. Malan Quizhpi v. Brackett, No. 25-389, Doc. No. 2 (D.N.H. Oct. 9, 2025)
52. Lamidi v. FCI Berlin, Warden, No. 25-00297, Doc. No. 14 (D.N.H. Sept. 15, 2025)

District of Rhode Island

53. Rodriguez v. Bondi, No. 25-406, 2025 WL 2899769 (D.R.I. Oct. 10, 2025)
54. Tomas Elias v. Hyde, No. 25-540, 2025 WL 3004437 (D.R.I. Oct. 27, 2025)
55. Astudillo v. Hyde, No. 25-551, 2025 WL 3035083 (D.R.I. Oct. 30, 2025)
56. Herrera Martinez v. Hyde, No. 25-575, 2025 WL 3124025 (D.R.I. Nov. 7, 2025)

SECOND CIRCUIT

Eastern District of New York

57. J.U. v. Maldonado, No. 25-04836, 2025 WL 2772765 (E.D.N.Y. Sept. 29, 2025)

58. Artiga v. Genalo, No. 25-5208, 2025 WL 2829434 (E.D.N.Y. Oct. 5, 2025)
59. Hyppolite v. Noem, No. 25-4304, 2025 WL 2829511 (E.D.N.Y. Oct. 6, 2025)

Southern District of New York

60. Lopez Benitez v. Francis, No. 25-5937, — F. Supp. 3d —, 2025 WL 2371588 (S.D.N.Y. Aug. 13, 2025)
61. Samb v. Joyce, No. 25-6373, 2025 WL 2398831 (S.D.N.Y. Aug. 19, 2025)
62. Gonzalez v. Joyce, No. 25-8250, 2025 WL 2961626 (S.D.N.Y. Oct. 19, 2025)
63. Romero Perez v. Francis, No. 25-8112, 2025 WL 3110459 (S.D.N.Y. Nov. 6, 2025)
64. Rueda Torres v. Francis, No. 25-8408, 2025 WL 3168759 (S.D.N.Y. Nov. 13, 2025)

Western District of New York

65. Barbosa da Cunha v. Moniz, No. 25-06532, Doc. No. 25 (W.D.N.Y. Oct. 20, 2025)
66. Alvarez Ortiz v. Freden, No. 25-960, — F. Supp. 3d —, 2025 WL 3085032 (W.D.N.Y. Nov. 4, 2025)

THIRD CIRCUIT

District of New Jersey

67. Zumba v. Bondi, No. 25-14626, 2025 WL 2753496 (D.N.J. Sept. 26, 2025)

68. Castillo v. Lyons, No. 25-16219, 2025 WL 2940990 (D.N.J. Oct. 10, 2025)
69. Buestan v. Chu, 2025 WL 2972252 (D.N.J. Oct. 21, 2025)
70. Bethancourt Soto v. Soto, No. 25-16200, — F. Supp. 3d —, 2025 WL 2976572 (D.N.J. Oct. 22, 2025)
71. Contreras Maldonado v. Cabezas, No. 25-13004, 2025 WL 2985256 (D.N.J. Oct. 23, 2025)
72. Lomeu v. Soto, No. 25-16589, 2025 WL 2981296 (D.N.J. Oct. 23, 2025)
73. Contreras Amaya v. Bondi, No. 25-16742, Doc. No. 7 (D.N.J. Oct. 26, 2025)
74. Patel v. Almodovar, No. 25-15345, 2025 WL 3012323 (D.N.J. Oct. 28, 2025)
75. Alaya Amaya v. Bondi, No. 25-16428, 2025 WL 3033880 (D.N.J. Oct. 30, 2025)
76. Mboup v. Field Off. Dir. of New Jersey Immigr. & Customs Enf't, No. 25-16882, 2025 WL 3062791 (D.N.J. Nov. 3, 2025)
77. Vincenz-Marquez v. Soto, No. 25-16906, 2025 WL 3097496 (D.N.J. Nov. 6, 2025)
78. Guaman Naula v. Noem, No. 25-16792, 2025 WL 3158490 (D.N.J. Nov. 12, 2025)
79. Moreira da Silva v. LaForge., No. 25-17095, 2025 WL 3173859 (D.N.J. Nov. 13, 2025)

Eastern District of Pennsylvania

80. Cantu-Cortes v. O'Neill, No. 25-6338, 2025 WL 3171639 (E.D. Pa. Nov. 13, 2025)
81. Kashranov v. Jamison, No. 25-05555, 2025 WL 3188399 (E.D. Pa. Nov. 14, 2025)

Western District of Pennsylvania

82. del Cid v. Bondi, No. 25-00304, 2025 WL 2985150 (W.D. Pa. Oct. 23, 2025)

FOURTH CIRCUIT

District of Maryland

83. Leal-Hernandez v. Noem, No. 25-02428, 2025 WL 2430025 (D. Md. Aug. 24, 2025)
84. Maldonado de Leon v. Baker, No. 25-3084, 2025 WL 2968042 (D. Md. Oct. 21, 2025)
85. Pineda Velasquez v. Sec'y Noem, No. 25-3215, 2025 WL 3003684 (D. Md. Oct. 27, 2025)

Middle District of North Carolina

86. S.D.B.B. v. Johnson, No. 25-882, 2025 WL 2845170 (M.D.N.C. Oct. 7, 2025)

Eastern District of Virginia

87. Hasan v. Crawford, No. 25-01408, — F. Supp. 3d —, 2025 WL 2682255 (E.D. Va. Sept. 19, 2025)
88. Quispe v. Crawford, No. 25-01471, 2025 WL 2783799 (E.D. Va. Sept. 29, 2025)

89. Diaz Gonzalez v. Lyons, No. 25-01583, Doc. No. 8 (E.D. Va. Oct. 1, 2025)
90. Gomez Alonzo v. Simon, No. 25-01587, Doc. No. 16 (E.D. Va. Oct. 1, 2025)
91. Perez Bibiano v. Lyons, No. 25-01590, Doc. No. 8 (E.D. Va. Oct. 1, 2025)
92. Vargas Nunez v. Lyons, No. 25-01574, Doc. No. 10 (E.D. Va. Oct. 1, 2025)
93. Ibarra Garcia v. Simon, No. 25-01663, Doc. No. 6 (E.D. Va. Oct. 3, 2025)
94. Guerra Leon v. Noem, No. 25-01634, Doc. No. 12 (E.D. Va. Oct. 8, 2025)
95. Maldonado Merlos v. Noem, No. 25-01645, Doc. No. 11 (E.D. Va. Oct. 9, 2025)
96. Singh v. Lyons, No. 25-01606, 2025 WL 2932635 (E.D. Va. Oct. 14, 2025)
97. Hernandez v. Crawford, No. 25-01565, 2025 WL 2940702 (E.D. Va. Oct. 16, 2025)
98. Flores Pineda v. Simon, No. 25-01616, 2025 WL 2980729 (E.D. Va. Oct. 21, 2025)
99. Gregorio Lapop v. Noem, No. 25-01666, 2025 WL 2997507 (E.D. Va. Oct. 24, 2025)
100. Duarte Escobar, v. Perry, No. 25-00758, 2025 WL 3006742 (E.D. Va. Oct. 27, 2025)
101. Sanchez-Lopez v. Crawford, No. 25-01721, Doc. No. 6 (E.D. Va. Oct. 27, 2025)
102. Sanchez Saire v. Elliston, No. 25-01808, Doc. No. 7 (E.D. Va. Oct. 27, 2025)
103. Garcia Guardado v. Lyons, No. 25-01741, Doc. No. 5 (E.D. Va. Oct. 28, 2025)
104. Montejo v. Lyons, No. 25-01751, Doc. No. 7 (E.D. Va. Oct. 28, 2025)
105. Velasquez Lozano v. Simon, No. 25-01731, Doc. No. 5 (E.D. Va. Oct. 28, 2025)
106. Torres Torres v. Noem, No. 25-01866, Doc. No. 10 (E.D. Va. Nov. 3, 2025)
107. Vicente v. U.S. Immigr. & Customs Enf't, No. 25-01836, Doc. No. 6 (E.D. Va. Nov. 3, 2025)
108. Lopez Sarmiento v. Perry, No. 25-01644, 2025 WL 3091140 (E.D. Va. Nov. 5, 2025)
109. Diaz Garcia v. Noem, No. 25-1712, 2025 WL 3111223 (E.D. Va. Nov. 6, 2025)
110. Servellon Martinez v. Lyons, No. 25-01792, Doc. No. 7 (E.D. Va. Nov. 7, 2025)
111. Kostak v. Trump, No. 25-01093, 2025 WL 2472136 (W.D. La. Aug. 27, 2025)

FIFTH CIRCUIT

Western District of Louisiana

112. Lopez Santos v. Noem, No. 25-01193, 2025 WL 2642278 (W.D. La. Sept. 11, 2025)

113. Barrios Sandoval v. Acuna, No. 25-01467, 2025 WL 3048926 (W.D. La. Oct. 31, 2025)

114. Silva Oliveira v. Patterson, No. 25-01463, 2025 WL 3095972 (W.D. La. Nov. 4, 2025)

Southern District of Texas

115. Buenrostro-Mendez v. Bondi, No. 25-3726, 2025 WL 2886346 (S.D. Tex. Oct. 7, 2025)

116. Covarrubias v. Vergara, No. 25-112, 2025 WL 2950097 (S.D. Tex. Oct. 8, 2025)

117. Angel Fuentes v. Lyons, No. 25-00153, Doc. No. 15 (S.D. Tex. Oct. 16, 2025)

118. Almanzan Tapia v. Vergara, No. 25-00174, Doc. No. 3 (S.D. Tex. Oct. 17, 2025)

119. Torres-Rodriguez v. Noem, No. 25-05035, Doc. No. 5 (S.D. Tex. Nov. 3, 2025)

120. Montoya Cabanas v. Bondi, No. 25-04830, 2025 WL 3171331 (S.D. Tex. Nov. 13, 2025)

121. Cruz Gutierrez v. Warden Thompson, No. 25-4695, 2025 WL 3187521 (S.D. Tex. Nov. 14, 2025)

SIXTH CIRCUIT

Western District of Kentucky

122. Barrera v. Tindall, No. 25-00541, 2025 WL 2690565 (W.D. Ky. Sept. 19, 2025)

123. Singh v. Lewis, No. 25-00096, 2025 WL 2699219 (W.D. Ky. Sept. 22, 2025)

124. Ballestros v. Noem, No. 25-594, 2025 WL 2880831 (W.D. Ky. Oct. 9, 2025)

125. Martinez-Elvir v. Olson, No. 25-589, — F. Supp. 3d —, 2025 WL 3006772 (W.D. Ky. Oct. 27, 2025)

126. Orellana v. Noem, No. 25-112, — F. Supp. 3d —, 2025 WL 3006763 (W.D. Ky. Oct. 27, 2025)

127. Hernandez Alonso v. Tindall, No. 25-652, 2025 WL 3083920 (W.D. Ky. Nov. 4, 2025)

Eastern District of Michigan

128. Lopez-Campos v. Raycroft, No. 25-12486, 2025 WL 2496379 (E.D. Mich. Aug. 29, 2025)

129. Pizarro Reyes v. Raycraft, No. 25-12546, 2025 WL 2609425 (E.D. Mich. Sept. 9, 2025)

130. Diaz Sandoval v. Raycraft, No. 25-12987, 2025 WL 2977517 (E.D. Mich. Oct. 17, 2025)

131. Pacheco Mayen, v. Raycraft, No. 25-13056, 2025 WL 2978529 (E.D. Mich. Oct. 17, 2025)

132. Casio-Mejia v. Raycraft, No. 25-13032, 2025 WL 2976737 (E.D. Mich. Oct. 21, 2025)
133. Santos Franco v. Raycraft, No. 25-13188, 2025 WL 2977118 (E.D. Mich. Oct. 21, 2025)
134. Gimenez Gonzalez v. Raycraft, No. 25-13094, 2025 WL 3006185 (E.D. Mich. Oct. 27, 2025)
135. Hernandez Capote v. Sec’y of U.S. Dep’t of Homeland Sec., No. 25-13128, 2025 WL 3089756 (E.D. Mich. Nov. 5, 2025)
136. Diego v. Raycraft, No. 25-13288, 2025 WL 3159106 (E.D. Mich. Nov. 12, 2025)
- Western District of Michigan**
137. Sanchez Alvarez v. Noem, No. 25-1090, 2025 WL 2942648 (W.D. Mich. Oct. 17, 2025)
138. Rodriguez Carmona v. Noem, No. 25-1131, 2025 WL 2992222 (W.D. Mich. Oct. 24, 2025)
139. Puerto-Hernandez v. Lynch, No. 25-1097, 2025 WL 3012033 (W.D. Mich. Oct. 28, 2025)
140. Marin Garcia v. Noem, No. 25-1271, 2025 WL 3017200 (W.D. Mich. Oct. 29, 2025)
141. Rodriguez v. Noem, No. 25-1196, 2025 WL 3022212 (W.D. Mich. Oct. 29, 2025)
142. de Jesus Ramirez v. Noem, No. 25-1261, 2025 WL 3039266 (W.D. Mich. Oct. 31, 2025)
143. Escobar-Ruiz v. Raycraft, No. 25-1232, 2025 WL 3039255 (W.D. Mich. Oct. 31, 2025)
144. Salgado Mendoza v. Noem, No. 25-1252, 2025 WL 3077589 (W.D. Mich. Nov. 4, 2025)
145. Hernandez Garcia v. Raycraft, No. 25-1281, 2025 WL 3122800 (W.D. Mich. Nov. 7, 2025)
146. Rodriguez Serrano v. Noem, No. 25-1320, 2025 WL 3122825 (W.D. Mich. Nov. 7, 2025)
147. Contreras Alvarez v. Noem, No. 25-1313, 2025 WL 3151948 (W.D. Mich. Nov. 12, 2025)
148. Lucero Lucero v. Noem, No. 25-1295, 2025 WL 3165235 (W.D. Mich. Nov. 12, 2025)
149. Ginez Hernandez v. Noem, No. 25-1307, 2025 WL 3170872 (W.D. Mich. Nov. 13, 2025)
150. Madrid Gonzalez v. Noem, No. 25-1315, 2025 WL 3170879 (W.D. Mich. Nov. 13, 2025)
151. Mora Lara v. Noem, No. 25-1332, 2025 WL 3170876 (W.D. Mich. Nov. 13, 2025)
152. Singh v. Noem, No. 25-1251, 2025 WL 3170855 (W.D. Mich. Nov. 13, 2025)
153. Amigon Cardona v. Unknown Party #1, No. 25-1297, 2025 WL 3200682 (W.D. Mich. Nov. 17, 2025)

154. Sevilla v. Noem, No. 25-1325, 2025 WL 3200698 (W.D. Mich. Nov. 17, 2025)

155. Silva Orellana v. Noem, No. 12-1333, 2025 WL 3198685 (W.D. Mich. Nov. 17, 2025)

Northern District of Ohio

156. Laguna Espinoza v. Dir. of Detroit Field Off., No. 25-02107, 2025 WL 2878173 (N.D. Ohio Oct. 9, 2025)

157. Moralez Chavez v. Dir. of Detroit Field Off., No. 25-02061, 2025 WL 2959617 (N.D. Ohio Oct. 20, 2025)

158. E.V. v. Raycraft, No. 25-02069, 2025 WL 3122837 (N.D. Ohio Nov. 7, 2025)

159. Morales Chavez v. Dir. of Detroit Field Off., No. 25-02061, 2025 WL 3187080 (N.D. Ohio Nov. 14, 2025)

Western District of Tennessee

160. Godinez-Lopez v. Ladwig, No. 25-02962, 2025 WL 3047889 (W.D. Tenn. Oct. 31, 2025)

SEVENTH CIRCUIT

Northern District of Illinois

161. Ochoa Ochoa v. Noem, No. 25-10865, 2025 WL 2938779 (N.D. Ill. Oct. 16, 2025)

162. H.G.V.U. v. Smith, No. 25-10931, 2025 WL 2962610 (N.D. Ill. Oct. 20, 2025)

163. G.Z.T. v. Smith, No. 25-12802, Doc. No. 14 (N.D. Ill. Oct. 21, 2025)

164. Miguel v. Noem, No. 25-11137, 2025 WL 2976480 (N.D. Ill. Oct. 21, 2025)

165. Padilla v. Noem, No. 25-12462, 2025 WL 2977742 (N.D. Ill. Oct. 22, 2025)

166. Maldonado v. Crowley, No. 25-12762, Doc. No. 16 (N.D. Ill. Oct. 24, 2025)

167. Patel v. Crowley, No. 25-11180, 2025 WL 2996787 (N.D. Ill. Oct. 24, 2025)

168. Amigon Sanchez v. Olson, No. 25-12453, 2025 WL 3004580 (N.D. Ill. Oct. 27, 2025)

169. Corona Diaz v. Olson, No. 25-12141, 2025 WL 3022170 (N.D. Ill. Oct. 29, 2025)

170. Rosales Ponce v. Olson, No. 25-13037, 2025 WL 3049785 (N.D. Ill. Oct. 31, 2025)

171. Valencia v. Noem, No. 25-12829, 2025 WL 3042520 (N.D. Ill. Oct. 31, 2025)

172. D.E.C.T. v. Noem, No. 25-12463, 2025 WL 3063650 (N.D. Ill. Nov. 3, 2025)

173. Flores v. Olson, No. 25-12916, 2025 WL 3063540 (N.D. Ill. Nov. 3, 2025)

174. Galvis Cortes v. Olsen, No. 25-6293, 2025 WL 3063636 (N.D. Ill. Nov. 3, 2025)

175. Reyes Arizmendi v. Noem, No. 25-13041, 2025 WL 3089107 (N.D. Ill. Nov. 5, 2025)

176. Mirzoev v. Olson, No. 25-12969, 2025 WL 3101969 (N.D. Ill. Nov. 6, 2025)
177. Pacheco Carrillo v. Noem, No. 25-12963, 2025 WL 3101993 (N.D. Ill. Nov. 6, 2025)
178. Garcia Rios v. Olson, No. 25-13180, 2025 WL 3124173 (N.D. Ill. Nov. 7, 2025)
179. Munoz Arredondo v. Olson, No. 25-12882, 2025 WL 3124149 (N.D. Ill. Nov. 7, 2025)
180. Perez v. Noem, No. 25-13441, 2025 WL 3140692 (N.D. Ill. Nov. 10, 2025)
181. Ramirez Martinez v. Noem, No. 25-12029, 2025 WL 3145103 (N.D. Ill. Nov. 11, 2025)
182. Vasquez Gonzalez v. Olson, No. 25-13162, 2025 WL 3158191 (N.D. Ill. Nov. 12, 2025)
183. Cabrera v. Noem, No. 25-12160, 2025 WL 3171288 (N.D. Ill. Nov. 13, 2025)
184. Mariscal Serrano v. Salazar, No. 23-13170, 2025 WL 3171354 (N.D. Ill. Nov. 13, 2025)
185. Rodriguez Lored v. Forestal, No. 25-12758, 2025 WL 3187319 (N.D. Ill. Nov. 14, 2025)

Southern District of Indiana

186. Campos Leon v. Forestal, No. 25-01774, 2025 WL 2694763 (S.D. Ind. Sept. 22, 2025)

187. Alejandro v. Olson, No. 25-02027, 2025 WL 2896348 (S.D. Ind. Oct. 11, 2025)
188. Singh v. Bondi, No. 25-02101, 2025 WL 3029524 (S.D. Ind. Oct. 30, 2025)
189. Delgado Avila v. Crowley, No. 25-00533, — F. Supp. 3d —, 2025 WL 3171175 (S.D. Ind. Nov. 13, 2025)
190. Quishpe-Guaman v. Noem, No. 25-00211, 2025 WL 3201072 (S.D. Ind. Nov. 17, 2025)

EIGHTH CIRCUIT

Northern District of Iowa

191. Giron Reyes v. Lyons, No. 25-04048, 2025 WL 2712427 (N.D. Iowa Sept. 23, 2025)
192. Garcia Picazo v. Sheehan, No. 25-4057, 2025 WL 3006188 (N.D. Iowa Oct. 27, 2025)
193. Chilel Chilel v. Sheehan, No. 25-4053, 2025 WL 3158617 (N.D. Iowa Nov. 12, 2025)

Southern District of Iowa

194. Barrajas v. Noem, No. 25-00322, 2025 WL 2717650 (S.D. Iowa Sept. 23, 2025)
195. Helbrum v. Williams Olson, No. 25-00349, 2025 WL 2840273 (S.D. Iowa Sept. 30, 2025)

District of Minnesota

196. Aguilar Maldonado v. Olson, No. 25-3142, — F. Supp. 3d —, 2025

- WL 2374411 (D. Minn. Aug. 15, 2025)
197. J.O.E. v. Bondi, No. 25-03051, — F. Supp. 3d —, 2025 WL 2466670 (D. Minn. Aug. 27, 2025)
198. Francisco T. v. Bondi, No. 25-03219, 2025 WL 2629839 (D. Minn. Aug. 29, 2025)
199. Belsai D.S. v. Bondi, No. 25-03682, 2025 WL 2802947 (D. Minn. Oct. 1, 2025)
200. Eliseo A.A. v. Olson, No. 25-3381, 2025 WL 2886729 (D. Minn. Oct. 8, 2025)
201. Herrera Avila v. Bondi, No. 25-3741, 2025 WL 2976539 (D. Minn. Oct. 21, 2025)
202. E.M. v. Noem, No. 25-975, 2025 WL 3157839 (D. Minn. Nov. 12, 2025)

Eastern District of Missouri

203. Mejia Olalde v. Noem, No. 25-00168, 2025 WL 3131942 (E.D. Mo. Nov. 10, 2025)

District of Nebraska

204. Garcia Jimenez v. Kramer, No. 25-03162, 2025 WL 2374223 (D. Neb. Aug. 14, 2025)
205. Carmona-Lorenzo v. Trump, No. 25-3172, 2025 WL 2531521 (D. Neb. Sept. 3, 2025)
206. Palma Perez v. Berg, No. 25-494, — F. Supp. 3d —, 2025 WL 2531566 (D. Neb. Sept. 3, 2025)

207. Genchi Palma v. Trump, No. 25-3176, 2025 WL 2624385 (D. Neb. Sept. 11, 2025)
208. Ozuna Carlon v. Karmer, No. 25-3178, 2025 WL 2624386 (D. Neb. Sept. 11, 2025)
209. Perez v. Kramer, No. 25-03179, 2025 WL 2624387 (D. Neb. Sept. 11, 2025)
210. Duenas Arce v. Trump, No. 25-520, Doc. No. 33 (D. Neb. Sept. 18, 2025)
211. Vargas Lopez v. Trump, No. 25-526, 2025 WL 2780351 (D. Neb. Sept. 30, 2025)

NINTH CIRCUIT

District of Arizona

212. Rosado v. Figueroa, No. 25-02157, 2025 WL 2337099 (D. Ariz. Aug. 11, 2025)
213. Echevarria v. Bondi, No. 25-3252, 2025 WL 2821282 (D. Ariz. Oct. 3, 2025)

Central District of California

214. Bautista v. Santacruz, No. 25-01873, 2025 WL 2670875 (C.D. Cal. July 28, 2025)
215. Gonzalez v. Noem, No. 25-02054, 2025 WL 2633187 (C.D. Cal. Aug. 13, 2025)
216. Benitez v. Noem, No. 25-02190, Doc. No. 11 (C.D. Cal. Aug. 26, 2025)
217. Mosqueda v. Noem, No. 25-02394, 2025 WL 2591530 (C.D. Cal. Sept. 8, 2025)

218. Arrazola-Gonzalez v. Noem, No. 25-1789, 2025 WL 2379285 (C.D. Cal. Aug. 15, 2025)
219. Santiago Flores v. Noem, No. 25-02490, 2025 WL 3050062 (C.D. Cal. Sept. 29, 2025)
220. Lopez Pop, v. Noem, No. 25-02589, 2025 WL 3050095 (C.D. Cal. Oct. 3, 2025)
221. Garcia v. Noem, No. 25-02771, 2025 WL 2986672 (C.D. Cal. Oct. 22, 2025)
222. Ruiz Yarleque v. Noem, No. 25-02836, 2025 WL 3043936 (C.D. Cal. Oct. 31, 2025)
229. F.M.V. v. Wofford, No. 25-01381, 2025 WL 3083934 (E.D. Cal. Nov. 4, 2025)
230. Menjivar Sanchez v. Wofford, No. 25-1187, 2025 WL 3089712 (E.D. Cal. Nov. 5, 2025)
231. O.P.A.M. v. Wofford, No. 25-01423, 2025 WL 3120552 (E.D. Cal. Nov. 7, 2025)
232. M.V.I. v. Andrews, No. 25-01440, 2025 WL 3154403 (E.D. Cal. Nov. 12, 2025)
233. Estuardo Marin v. Andrews, No. 25-01422, 2025 WL 3171484 (E.D. Cal. Nov. 13, 2025)

Eastern District of California

223. Guzman v. Andrews, No. 25-01015, 2025 WL 2617256 (E.D. Cal. Sept. 9, 2025)
224. Lepe v. Andrews, No. 25-01163, — F. Supp. 3d —, 2025 WL 2716910 (E.D. Cal. Sept. 23, 2025)
225. Ortiz Donis v. Chestnut, No. 25-01228, 2025 WL 2879514 (E.D. Cal. Oct. 9, 2025)
226. J.S.H.M v. Wofford, No. 25-01309, 2025 WL 2938808 (E.D. Cal. Oct. 16, 2025)
227. Sabi Polo v. Chestnut, No. 25-01342, 2025 WL 2959346 (E.D. Cal. Oct. 17, 2025)
228. C.A.R.V. v. Wofford, No. 25-01395, 2025 WL 3059549 (E.D. Cal. Nov. 3, 2025)

234. Morillo v. Albarran, No. 25-01533, 2025 WL 3190899 (E.D. Cal. Nov. 15, 2025)

Northern District of California

235. Hernandez Nieves v. Kaiser, No. 25-6921, 2025 WL 2533110 (N.D. Cal. Sept. 3, 2025)
236. Hinestroza v. Kaiser, No. 25-07559, 2025 WL 2606983 (N.D. Cal. Sept. 9, 2025)
237. Salcedo Aceros v. Kaiser, No. 25-06924, 2025 WL 2637503 (N.D. Cal. Sept. 12, 2025)
238. Roa v. Albarran, No. 25-07802, 2025 WL 2732923 (N.D. Cal. Sept. 25, 2025)
239. Valencia Zapata v. Kaiser, No. 25-07492, — F. Supp. 3d —, 2025 WL 2741654 (N.D. Cal. Sept. 26, 2025)

240. Cordero Pelico v. Kaiser, No. 25-07286, 2025 WL 2822876 (N.D. Cal. Oct. 3, 2025)

241. Chavez v. Kaiser, No. 25-06984, 2025 WL 2909526 (N.D. Cal. Oct. 9, 2025)

242. Pablo Sequen v. Albarran, No. 25-06487, 2025 WL 2935630 (N.D. Cal. Oct. 15, 2025)

243. J.A.C.P. v. Wofford, No. 25-01354, 2025 WL 3013328 (E.D. Cal. Oct. 27, 2025)

244. J.A.E.M. v. Wofford, No. 25-01380, 2025 WL 3013377 (E.D. Cal. Oct. 27, 2025)

245. Ramandi v. Off. Dir., ICE ERO San Francisco, No. 25-01462, 2025 WL 3182732 (E.D. Cal. Nov. 14, 2025)

Southern District of California

246. Vasquez Garcia v. Noem, No. 25-02180, 2025 WL 2549431 (S.D. Cal. Sept. 3, 2025)

247. Sixtos Chavez v. Noem, No. 25-2325, Doc. No. 8 (S.D. Cal. Sept. 24, 2025)

248. Esquivel-Ipina v. LaRose, No. 25-2672, 2025 WL 2998361 (S.D. Cal. Oct. 24, 2025)

249. Lopez v. Warden, Otay Mesa Det. Ctr., No. 25-2527, 2025 WL 3005346 (S.D. Cal. Oct. 27, 2025)

250. Martinez Lopez v. LaRose, No. 25-2717, 2025 WL 3030457 (S.D. Cal. Oct. 30, 2025)

251. Carmelo Beltran v. Noem, No. 25-2650, 2025 WL 3078837 (S.D. Cal. Nov. 4, 2025)

252. Garcia Magadan v. Noem, No. 25-2889, 2025 WL 3090089 (S.D. Cal. Nov. 5, 2025)

253. Aquino v. LaRose, No. 25-2904, 2025 WL 3158676 (S.D. Cal. Nov. 12, 2025)

254. Pelico Calel v. LaRose, No. 25-02883, 2025 WL 3171898 (S.D. Cal. Nov. 13, 2025)

District of Hawaii

255. Rico-Tapia v. Smith, No. 25-00379, 2025 WL 2950089 (D. Haw. Oct. 10, 2025)

District of Nevada

256. Maldonado Vazquez v. Feeley, No. 25-01542, 2025 WL 2676082 (D. Nev. Sept. 17, 2025)

257. Sanchez Roman v. Noem, No. 25-01684, 2025 WL 2710211 (D. Nev. Sept. 23, 2025)

258. Carlos v. Noem, No. 25-01900, 2025 WL 2896156 (D. Nev. Oct. 10, 2025)

259. E.C. v. Noem, No. 25-01789, 2025 WL 2916264 (D. Nev. Oct. 14, 2025)

260. Aparicio v. Noem, No. 25-01919, 2025 WL 2998098 (D. Nev. Oct. 23, 2025)

261. Dominguez-Lara v. Noem, No. 25-01553, 2025 WL 2998094 (D. Nev. Oct. 24, 2025)

262. Bautista-Avalos v. Bernacke, No. 25-1987, 2025 WL 3014023 (D. Nev. Oct. 27, 2025)

263. Arce-Cervera v. Noem, No. 25-01895, 2025 WL 3017866 (D. Nev. Oct. 28, 2025)

264. Rodriguez Cabrera v. Mattos, No. 25-01551, 2025 WL 3072687 (D. Nev. Nov. 3, 2025)

265. Hernandez-Luna v. Noem, No. 25-01818, 2025 WL 3102039 (D. Nev. Nov. 6, 2025)

266. Mendez v. Noem, No. 25-02062, 2025 WL 3124285 (D. Nev. Nov. 7, 2025)

District of Oregon

267. L.A.E. v. Wamsley, No. 25-01975, 2025 WL 3037856 (D. Or. Oct. 30, 2025)

268. J.Y.L.C. v. Bostock, No. 25-02083, Doc. No. 15 (D. Or. Nov. 12, 2025)

Western District of Washington

269. Rodriguez v. Bostock, No. 25-05240, 2025 WL 2782499 (W.D. Wash. Sept. 30, 2025)

270. Torres v. Wamsley, No. 25-5772, 2025 WL 2855379 (W.D. Wash. Oct. 8, 2025)

271. Cantero Garcia v. Wamsley, No. 25-02092, 2025 WL 3123996 (W.D. Wash. Nov. 7, 2025)

272. Marcia Navarette v. Wamsley, No. 25-02150, 2025 WL 3134712 (W.D. Wash. Nov. 10, 2025)

TENTH CIRCUIT

District of Colorado

273. Garcia Cortes v. Noem, No. 25-02677, 2025 WL 2652880 (D. Colo. Sept. 16, 2025)

274. Mendoza Gutierrez, v. Baltazar, No. 25-2720, 2025 WL 2962908 (D. Colo. Oct. 17, 2025)

275. Loa Caballero v. Baltazar, No. 25-03120, 2025 WL 2977650 (D. Colo. Oct. 22, 2025)

276. Nava Hernandez v. Baltazar, No. 25-03094, 2025 WL 2996643 (D. Colo. Oct. 24, 2025)

District of New Mexico

277. Velasquez Salazar v. Dedos, No. 25-00835, — F. Supp. 3d —, 2025 WL 2676729, (D.N.M. Sept. 17, 2025)

278. Garcia Domingo v. Castro, No. 25-00979, — F. Supp. 3d —, 2025 WL 2941217 (D.N.M. Oct. 15, 2025)

279. Pu Sacvin v. de Anda-Ybarra, No. 25-01031, 2025 WL 3187432 (D.N.M. Nov. 14, 2025)

ELEVENTH CIRCUIT

Middle District of Florida

280. Garcia v. Noem, No. 25-00879, 2025 WL 3041895 (M.D. Fla. Oct. 31, 2025)

281. Hernandez Lopez v. Hardin, No. 25-00830, 2025 WL 3022245 (M.D. Fla. Oct. 29, 2025)

- 282. Vasquez Carcamo v. Noem, No. 25-00922, 2025 WL 3119263 (M.D. Fla. Nov. 7, 2025)
- 283. Erazo v. Hardin, No. 25-00891, 2025 WL 3187136 (M.D. Fla. Nov. 14, 2025)

Southern District of Florida

- 284. Merino v. Ripa, No. 25-23845, 2025 WL 2941609 (S.D. Fla. Oct. 15, 2025)
- 285. Puga v. Assistant Field Off. Dir., Krome N. Serv. Processing Ctr., No. 25-24535, 2025 WL 2938369 (S.D. Fla. Oct. 15, 2025)

Middle District of Georgia

- 286. J.A.M. v. Streeval, No. 25-342, 2025 WL 3050094 (M.D. Ga. Nov. 1, 2025)

Southern District of Georgia

- 287. Aguirre Villa v. Warden Normand, No. 25-89, 2025 WL 3095969 (S.D. Ga. Nov. 4, 2025)
- 288. Villa v. Warden Normand, No. 25-100, 2025 WL 3188406 (S.D. Ga. Nov. 14, 2025)