

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

ABRAHAM IGNACIO PEREIRA VIDAL

Petitioner,

v.

BRIAN MCSHANE, ET AL.,

Respondents.

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Civil Action No. 2:26-cv-1903

**RESPONSE IN OPPOSITION TO
PETITION FOR WRIT OF HABEAS CORPUS**

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Dated: March 31, 2026

I. INTRODUCTION

Petitioner has filed a petition for writ of habeas corpus, challenging the authority of the Secretary of the U.S. Department of Homeland Security (DHS) to detain him under the Immigration and Nationality Act (INA), 8 U.S.C. § 1226(a). **This petition is distinguishable from the numerous petitions recently considered by this Court in the wake of the Board of Immigration Appeals' (BIA) decision in *Matter of Hurtado*, 29 I&N Dec. 216 (BIA 2025), which is not implicated here.** See e.g., *Cantu-Cortes v. O'Neill, et al.*, No. 25-cv-6338, 2025 WL 3171639, at *1–2 (E.D. Pa. Nov. 13, 2025) (Kenney, J.); *Anirudh v. McShane, et al.*, No. 25-cv-6458 (E.D. Pa. Dec. 8, 2025) (Bartle, J.); *Juarez Velazquez v. O'Neill, et al.*, No. 25-cv-6191 (E.D. Pa. Dec. 3, 2025) (Henry, J.). The cases cited above involved **aliens detained under the mandatory detention provisions of 8 U.S.C. § 1225(b)(2)(A)** because they are removable and present in the United States without inspection and admission or parole.

However, Petitioner is subject to detention under **8 U.S.C. § 1226(a) [not 8 U.S.C. § 1225(b)(2)(A)]** because he was admitted to the United States on a valid nonimmigrant visa but is alleged to have violated the conditions of that visa, rendering him removable under 8 U.S.C. § 1227(a)(1)(B). **Detention under 8 U.S.C. § 1226(a), unlike detention under 8 U.S.C. § 1225(b)(2)(A), allows Petitioner to request a bond hearing before an immigration judge. The Third Circuit Court of Appeals (Third Circuit) has held that this administrative review process for individuals detained under 8 U.S.C. § 1226(a) is constitutionally sound.** *Borbot v. Warden Hudson Cty. Corr. Facility*, 906 F.3d 274 (3d Cir. 2018); see also *Guaman Guerrero v. McShane, et al.*, Case No. 2:25-cv-06974, Order (ECF No. 8) (E.D. Pa. Jan. 27, 2026) (Gallagher, J.) (denying

petition for writ of habeas corpus challenging the constitutional adequacy of a bond hearing under 8 U.S.C. § 1226(a), where the record demonstrated that the noncitizen was afforded process through a constitutionally adequate bond hearing, notwithstanding denial of bond, as well as the opportunity to seek administrative review before the BIA). Therefore, given the unique procedural posture of this case and Petitioner's ability to seek administrative review of DHS's custody determination with an immigration judge, and, later, if appropriate, the BIA, Respondents ask this Court to deny the petition.

II. FACTS AND PROCEDURAL HISTORY

Petitioner, a native and citizen of Venezuela, was admitted to the United States on or about October 25, 2017 on a nonimmigrant visitor visa. *See* Ex. A – Form I-213, Record of Deportable/Inadmissible Alien (dated March 23, 2026). The terms of that nonimmigrant visa permitted him to remain in the United States for a temporary period not to exceed April 24, 2018. *Id.* Petitioner is alleged to have remained in the United States beyond this temporary period. Ex. B – Form I-862, Notice to Appear (dated Nov. 14, 2018).

On July 6, 2018, Petitioner filed an affirmative Form I-589, Application for Asylum and Withholding of Removal with the United States Citizenship and Immigration Services (USCIS). Ex. A. USCIS issued a decision on August 29, 2018, finding Petitioner ineligible for asylum and referring his application to an immigration judge for review. *Id.* To facilitate this review process, USCIS placed

Petitioner into removal proceedings under 8 U.S.C. § 1227(a)(1)(B) through issuance of a Notice to Appear (NTA). Ex. B.

An immigration judge administratively closed Petitioner's removal proceedings on August 8, 2023, based on Petitioner's then-approved Form I-821, Application for Temporary Protected Status (TPS). Ex. A. Petitioner's TPS was terminated on November 19, 2025. *Id.* On February 4, 2026, Petitioner was arrested by the Delaware State Police Division of Gaming Enforcement for underage gambling; this charge is still pending today. *Id.* Petitioner has also accrued several traffic violations while residing in the United States. *Id.* Based on Petitioner's criminal history, and following termination of his TPS, ICE arrested and detained Petitioner on March 23, 2026. *Id.*; *see also* Ex. C – Form I-200, Warrant for Arrest of Alien (dated Feb. 4, 2026); Ex. D – Form I-286, Notice of Custody Determination (dated March 23, 2026).

Upon arrest and detention by ICE, Petitioner indicated his intent to request review by an immigration judge of ICE's custody determination. Ex. D. Notwithstanding, Petitioner did not seek to have his administratively-closed removal proceedings recalendared—the necessary first step to having a custody redetermination hearing before an immigration judge. On March 30, 2026, ICE filed a motion to recalendar Petitioner's administratively closed removal proceedings, as well as a motion to sever his removal proceedings from his family's removal proceedings, given the now unique posture of his case. Ex. E – Motion to Recalendar and Sever (dated March 30, 2026).

At the time of this response, Petitioner remained detained in the Eastern District of Pennsylvania.

III. LEGAL STANDARD

A writ of habeas corpus is an “extraordinary remedy.” *Shinn v. Ramirez*, 596 U.S. 366, 377 (2022). The petitioner bears the burden of showing his confinement is unlawful. *Hawk v. Olson*, 326 U.S. 271, 279 (1945); accord *Cullen v. Pinholster*, 563 U.S. 170, 181 (2011) (habeas petition “carries the burden of proof”); see 18 U.S.C. § 2241.

Judicial review of immigration matters, including of detention issues, is limited. *I.N.S. v. Aguirre-Aguirre*, 526 U.S. 415, 425 (1999); *Reno v. Am.-Arab Anti-Discrimination Comm. (AADC)*, 525 U.S. 471, 489-92 (1999); *Miller v. Albright*, 523 U.S. 420, 434 n.11 (1998); *Fiallo v. Bell*, 430 U.S. 787, 792 (1977); *Reno v. Flores*, 507 U.S. 292, 305 (1993); *Hampton v. Mow Sun Wong*, 426 U.S. 88, 101 n.21 (1976) (“[T]he power over aliens is of a political character and therefore subject only to narrow judicial review.”). The Supreme Court has “underscore[d] the limited scope of inquiry into immigration legislation,” and “has repeatedly emphasized that over no conceivable subject is the legislative power of Congress more complete than it is over the admission of aliens.” *Fiallo*, 430 U.S. at 792 (internal quotation omitted); *Mathews v. Diaz*, 426 U.S. 67, 79-82 (1976); *Galvan v. Press*, 347 U.S. 522, 531 (1954).

The plenary power of Congress and the Executive Branch over immigration necessarily encompasses immigration detention, because the authority to detain is

elemental to the authority to deport and because public safety is at stake. *See Shaughnessy v. United States*, 345 U.S. 206, 210 (1953) (“Courts have long recognized the power to expel or exclude aliens as a fundamental sovereign attribute exercised by the Government’s political departments largely immune from judicial control.”); *Carlson v. Landon*, 342 U.S. 524, 538 (1952) (“Detention is necessarily a part of this deportation procedure.”); *Demore v. Kim*, 538 U.S. 510, 531 (2003) (“Detention during removal proceedings is a constitutionally permissible part of that process.”); *Jennings v. Rodriguez*, 583 U.S. 281, 286 (2018) (“Congress has authorized immigration officials to detain some classes of aliens during the course of certain immigration proceedings. Detention during those proceedings gives immigration officials time to determine an alien’s status without running the risk of the alien’s either absconding or engaging in criminal activity before a final decision can be made.”).

Petitioner must make a strong showing to demonstrate that his continued detention violates the Constitution or laws of the United States. *See United States v. Five Gambling Devices*, 346 U.S. 441, 449 (1953) (“This Court does and should accord a strong presumption of constitutionality to Acts of Congress. This is not a mere polite gesture. It is a deference due to deliberate judgment by constitutional majorities of the two Houses of Congress that an Act is within their delegated power or is necessary and proper to execution of that power”).

IV. ARGUMENT

The Court should deny the habeas petition because: (i) Petitioner is lawfully

detained under 8 U.S.C. § 1226(a), which affords Petitioner the opportunity to seek administrative review of his detention through a custody redetermination hearing before an immigration judge and, later, the BIA; and (ii) Petitioner's detention does not violate the Fifth Amendment's Due Process Clause.

1. Petitioner is lawfully detained under 8 U.S.C. § 1226(a).

The Court should deny the petition because Petitioner's detention is lawful under 8 U.S.C. § 1226(a), which affords him the opportunity to administratively contest his detention. 8 U.S.C. § 1226(a) provides that the Attorney General "may" issue a warrant for the arrest and detention of a noncitizen pending a decision on whether the noncitizen is to be removed. Provided the noncitizen is not subject to mandatory detention under 8 U.S.C. § 1226(c), the Attorney General, through the DHS district director, makes an initial custody determination as to whether it should detain a noncitizen pending completion of the removal proceedings, or whether it should release the noncitizen on bond. *See* 8 C.F.R. § 236.1(c).

If the district director denies bond and the noncitizen is not subject to an administratively final order of removal, the noncitizen may seek his release by requesting an initial bond redetermination hearing before an immigration judge. *See* 8 C.F.R. §§ 236.1(d), 1003.19. A noncitizen may appeal an immigration judge's decision on a bond redetermination to the BIA. *See* 8 C.F.R. § 236.1(d)(3). The BIA's decision to detain or release an arrested noncitizen on bond is discretionary and is not subject to judicial review. 8 U.S.C. § 1226(e). If denied bond, a noncitizen can subsequently request an additional bond redetermination hearing before an

immigration judge, which he must make in writing. 8 C.F.R. §1003.19(e). This request “shall be considered only upon a showing that the alien’s circumstances have changed materially since the prior bond redetermination.” *Id.*

As of the date of this Response, Petitioner has been detained for eight (8) days. Petitioner is detained pursuant to 8 U.S.C. § 1226(a), as he is removable for having violated the conditions of his nonimmigrant status. *See* Ex. B. The Attorney General has the statutory authority and discretion to detain Petitioner during the pendency of his removal proceedings. *See* 8 U.S.C. § 1226(a). Therefore, Petitioner’s detention under 8 U.S.C. § 1226(a) is lawful.

a. ICE made the discretionary determination that detention is warranted under 8 U.S.C. § 1226(a)

ICE properly determined that detention is warranted under 8 U.S.C. § 1226(a). Petitioner argues that ICE improperly detained him because it did so “without explanation, without a warrant, and without an individualized determination that detention was warranted.” ECF 1 ¶ 7. This claim is belied by the facts and evidence in Petitioner’s case. Following the November 2025 termination of Petitioner’s TPS and his February 2026 arrest, ICE executed a Form I-200, Warrant for Arrest of Alien and arrested Petitioner March 23, 2026. Exs. A, C. ICE thereafter made the discretionary determination to detain Petitioner in custody under 8 U.S.C. § 1226 during the remainder of his removal proceedings, as evidenced by completion of the Form I-286. Ex. D. Petitioner requested, as is his right, review of this custody determination by an immigration judge. *Id.* Therefore, the facts and evidence in Petitioner’s case demonstrates that ICE made a

discretionary determination to detain him pending completion of his removal proceedings, as is authorized under 8 U.S.C. § 1226(a).

b. Petitioner has not exhausted the administrative remedies available to him by virtue of his detention under 8 U.S.C. § 1226(a)

Notwithstanding ICE's detention decision, Petitioner may request a custody redetermination hearing before an immigration judge, which he has not done. 8 C.F.R. §§ 236.1(d), 1003.19. At this custody redetermination hearing, also referred to as a bond hearing, Petitioner will be afforded the opportunity to present evidence to the immigration judge in support of his argument that he should be released on bond, including evidence related to his equities in the United States. Based on that evidence, the immigration judge may redetermine Petitioner's custody. However, if the immigration judge does not redetermine Petitioner's custody, or to the extent Petitioner disagrees with the nature of the bond imposed by the immigration judge, he may appeal the immigration judge's decision to the BIA. 8 C.F.R. § 236.1(d)(3).

Importantly, none of the above administrative process afforded to Petitioner under the statute and regulations has happened yet. Petitioner has not yet requested a custody redetermination hearing before an immigration judge, nor has an immigration judge conducted a custody redetermination hearing in his case. Moreover, Petitioner has not filed a motion to recalendar his administratively-closed proceedings—the first step in the process of obtaining a bond hearing in his case—though ICE did file that motion on March 30, 2026. Ex. E. Petitioner instead seeks to avoid the administrative process available to him by filing the Petition and

asking the Court to order his immediate release. This circumvents the INA and regulations, and because Petitioner has not exhausted his administrative remedies, the Court should deny the Petition.

c. Petitioner is detained under 8 U.S.C. § 1226(a), not 8 U.S.C. § 1225(b)(2)

Petitioner argues throughout the Petition that he is detained under 8 U.S.C. § 1225(b)(2). This is incorrect, for all the reasons discussed *supra*. The Petition in this matter seeks relief far beyond that requested in the majority of the over 300 immigration habeas cases that have been recently filed in this district. Most of those cases have analyzed mandatory detention under 8 U.S.C. § 1225(b)(2), while a handful have addressed mandatory detention under 8 U.S.C. § 1225(b)(1). The majority of cases have found that ICE has wrongfully denied access to the § 1226(a) bond process by misclassifying detained persons under § 1225(b)(2). But this Petitioner—whose detention ICE classified as falling under § 1226(a) and the accompanying bond process—now asks the Court to disregard the statute.

Petitioner's case presents the same factual scenario as that of any person who overstayed the terms of a nonimmigrant visa since the INA was amended in 1997. None of the recent changes in policy or statutory interpretation that Petitioner discusses are implicated here, and Petitioner remains entitled to pursue the administrative process afforded to him, and any other person detained, under § 1226(a). Accordingly, because Petitioner's detention is lawful, statutorily authorized, and not yet ripe for review by this Court for failure to exhaust administrative remedies, the Court should deny the Petition.

2. Petitioner’s lawful detention does not violate constitutional due process.

The Court should further deny the Petition because Petitioner’s detention comports with constitutional due process. Courts may only grant habeas relief if a petitioner can establish that his present detention is unlawful. 28 U.S.C.

§ 2241(c)(3). As repeatedly recognized by the Supreme Court, “[i]n the exercise of its broad power over naturalization and immigration, Congress regularly makes rules that would be unacceptable if applied to citizens.” *Demore v. Kim*, 538 U.S. 510, 522 (2003) (quoting *Mathews v. Diaz*, 426 U.S. 67, 79-80 (1976)); *Reno v. Flores*, 507 U.S. 292, 305-306 (1993). Therefore, while the Fifth Amendment entitles noncitizens to due process in deportation proceedings, “detention during deportation proceedings is a constitutionally valid aspect of the deportation process.” *Demore*, 538 U.S. at 523; see also *Reno*, 507 U.S. 292 (upholding INS’s detention policies regarding juvenile aliens with its “blanket” presumption of the unsuitability of custodians other than parents, close relatives, and guardians).

Here, as indicated above, Petitioner is detained pursuant to statutory and discretionary authority under 8 U.S.C. § 1226(a) given his manner of entry and the facts and circumstances of his case. By virtue of his detention under 8 U.S.C. § 1226(a), he is afforded the opportunity to contest his detention through a custody redetermination hearing before an immigration judge and, later, the BIA. 8 C.F.R. §§ 236.1(d), (d)(3), 1003.19. He has not yet availed himself of this administrative review process. Therefore, Petitioner cannot demonstrate that his detention of eight days violates constitutional due process.

Petitioner may claim that, notwithstanding the administrative process afforded to him under the INA and accompanying regulations, his detention nonetheless violates due process because such administrative process is constitutionally deficient. This allegation would be speculative and not ripe for review by this Court, as Petitioner has not yet even requested a custody redetermination hearing in his case. *See Texas v. United States*, 523 U.S. 296, 300 (1998) (“A claim is not ripe for adjudication if it rests upon ‘contingent future events that may not occur as anticipated, or indeed may not occur at all.’”)

Moreover, numerous courts, including the Supreme Court, have looked favorably on the administrative procedures governing 8 U.S.C. § 1226(a). For example, the Third Circuit rejected a due process challenge to detention under 8 U.S.C. § 1226(a). *See Borbot*, 906 F.3d at 274. In *Borbot*, a habeas petitioner argued that, based on the *length* of his detention under 8 U.S.C. § 1226(a)—of more than one year—he was constitutionally entitled to a second bond hearing at which the Government would bear the burden of proof. *Id.* at 276–77. The Third Circuit rejected petitioner’s argument, which relied on cases involving prolonged detention under the mandatory detention statute at 8 U.S.C. § 1226(c). *Id.* The court there noted that, “unlike § 1226(c) detainees . . . who were detained for prolonged periods without being given any opportunity to apply for release on bond, [petitioner] *was granted meaningful process* prior to filing his habeas petition.” *Id.* at 279 (emphasis added).

The alien in *Borbot* predicated his challenge to 8 U.S.C. § 1226(a) on the

length of his detention and did not take issue with his initial bond hearing. Nonetheless, the Third Circuit’s central holding was that no additional procedures were required because the existing procedures for bond hearings under 8 U.S.C. § 1226(a) are constitutionally adequate. *Id.* at 278–29. The Third Circuit specifically noted that “Borbot was afforded a prompt bond hearing, *as required by § 1226(a) and its implementing regulations*,” and it was on this basis that the court concluded he was “granted meaningful process.” *Id.* (emphasis added). *Borbot* thus stands for the proposition that 8 U.S.C. § 1226(a) and its implementing regulations fully satisfy the requirements of due process.

Here, in detaining Petitioner under 8 U.S.C. § 1226(a), ICE is providing Petitioner the same type of process that was afforded the petitioner in *Borbot*, and which the Third Circuit in *Borbot* found to be constitutionally adequate. Moreover, Petitioner’s detention is not prolonged, as he has been detained for only eight days. *See Contant v. Holder*, 352 Fed. Appx. 692 (3d Cir. 2009) (affirming denial of a petitioner’s habeas petition where he had received process under 8 U.S.C. § 1226(a) and his 19 months’ detention was not overly prolonged). Therefore, because Petitioner’s detention under 8 U.S.C. § 1226(a) comports with constitutional due process, the Court should deny the petition. *See Guaman Guerrero v. McShane, et al.*, Case No. 2:25-cv-06974, Order (ECF No. 8) (E.D. Pa. Jan. 27, 2026) (Gallagher, J.).

V. CONCLUSION

For the foregoing reasons, Respondents respectfully request that the petition

for writ of habeas corpus be denied.

Respectfully submitted,

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United States Attorney

/s/ Susan R. Becker for GBD
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Assistant United States Attorney
Chief, Civil Division

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Counsel for Respondents

Dated: March 31, 2026

CERTIFICATE OF SERVICE

I certify that on this date, I filed the foregoing Response in Opposition to Petition for Writ of Habeas Corpus via the Court's CM/ECF System, thereby making it available for viewing and download for all parties to the case.

Dated: March 31, 2026

/s/ Daniella D. Lees
DANIELLA D. LEES
Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT
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ABRAHAM IGNACIO PEREIRA VIDAL,

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Civil Action No. 2:26-cv-1903

EXHIBIT LIST

Exhibit A: Form I-213, Record of Deportable/Inadmissible Alien (dated March 23, 2026).

Exhibit B: Form I-862, Notice to Appear (dated Nov. 14, 2018).

Exhibit C: Form I-200, Warrant for Arrest of Alien (dated Feb. 4, 2026).

Exhibit D: Form I-286, Notice of Custody Determination (dated March 23, 2026).

Exhibit E: Motion to Recalendar and Sever (dated March 30, 2026).

U.S. Department of Homeland Security

Subject ID : [REDACTED]

Record of Deportable/Inadmissible Alien

Family Name (CAPS) PEREIRA VIDAL, ABRAHAM IGNACIO		First	Middle	Sex M	Hair BRO	Eyes BRO	Cmpbkn
Country of Citizenship VENEZUELA	Passport Number and Country of Issue	File Number		Height 71	Weight 185	Occupation See Narrative	
U.S. Address [REDACTED]				Scars and Marks			
Date, Place, Time, and Manner of Last Entry 10/25/2017 04:29, JFK, B2-visitor For Pleasure				Passenger Boarded at See Narrative			
Number, Street, City, Province (State) and Country of Permanent Residence				F.B.I. Number [REDACTED] ☐ Single ☐ Divorced ☐ Married ☐ Widower ☐ Separated			
Date of Birth [REDACTED] Age: 19				Method of Location/Apprehension NCA			
Date of Action 03/23/2026		Location Code DVD/PHI		At/Near See I-831		Date/Hour 03/23/2026 07:45	
City, Province (State) and Country of Birth Caracas, VENEZUELA		AR ☒ Form: (Type and No.) Lifted ☐ Not Lifted ☐		By A 13483 ODEECHRISTOPHER MCBEE			
NIV Issuing Post and NIV Number		Social Security Account Name		Status at Entry		Status When Found	
Date Visa Issued		Social Security Number [REDACTED]		Length of Time Illegally in U.S.			
Immigration Record NEGATIVE				Criminal Record See Narrative			
Name, Address, and Nationality of Spouse (Maiden Name, if Appropriate)						Number and Nationality of Minor Children None	
Father's Name, Nationality, and Address, if Known PEREIRA ARRIECHE, PEDRO ATILIO NATIONALITY: VENEZUELA				Mother's Present and Maiden Names, Nationality, and Address, if Known VIDAL ARTETA, MONICA MARIA NATIONALITY: COLOMBIA			
Monies Due/Property in U.S. Not in Immediate Possession None Claimed		Fingerprinted? ☒ Yes ☐ No		Systems Checks See Narrative		Charge Code Words(s) See Narrative	
Name and Address of (Last)(Current) U.S. Employer See Narrative		Type of Employment Other Unrelated		Salary		Employed from/to Hr 06/01/2025	
Narrative (Outline particulars under which alien was located/apprehended. Include details not shown above regarding time, place and manner of last entry, attempted entry, or any other entry, and elements which establish administrative and/or criminal violation. Indicate means and route of travel to interior.) FIN: [REDACTED] Left Index fingerprint Right Index fingerprint							
							
Body Worn Camera (BWC) Information ----- BWC footage was recorded for this enforcement activity. BWC footage was viewed prior to the completion of this report. ----- FAMILY INFORMATION ----- Father: PEREIRA ARRIECHE, PEDRO ATILIO is a citizen of VENEZUELA. Mother: VIDAL ARTETA, MONICA MARIA is a citizen of COLOMBIA, , her immigration status is No Status. Spouse: Subject is not married. ... (CONTINUED ON I-831)							
Alien has been advised of communication privileges _____ (Date/Initials)				A 13483 ODEE Deportation Officer _____ (Signature and Title of Immigration Officer)			
Distribution:				Received: (Subject and Documents) (Report of Interview) Officer: A 13483 ODEE on: March 23, 2026 _____ (time) Disposition: Other Examining Officer: BROCKSON, T-9818			

U.S. Department of Homeland Security

Continuation Page for Form I-213

Alien's Name PEREIRA VIDAL, ABRAHAM IGNACIO	File Number [REDACTED] Event No: [REDACTED]	Date 03/23/2026
Child: Subject does not have children or dependents. SUBJECT HEALTH STATUS ----- The subject claims good health. CURRENT ADMINISTRATIVE CHARGES ----- 03/23/2026 - 237a1B - NONIMMIGRANT OVERSTAY BOARDED AT ----- Panama City, PANAMA RECORDS CHECKED ----- AFIS checked on 03/23/2026 with Positive result. CCD checked on 03/23/2026 with Positive result. CIS checked on 03/23/2026 with Positive result. EARM checked on 03/23/2026 with Negative result. TECS checked on 03/23/2026 with Positive result. IAFIS checked on 03/23/2026 with Positive result. NCIC checked on 03/23/2026 with Negative result. OCCUPATION ----- Credit Special NAME AND ADDRESS OF US EMPLOYER ----- [REDACTED] ARRESTED AT/NEAR ----- E CLEVELAND AVE & MCKEES LANE, NEWARK, DELAWARE, 19711, UNITED STATES RECORD OF DEPORTABLE/EXCLUDABLE ALIEN: ----- Target: PEREIRA VIDAL, Abraham Ignacio A: [REDACTED] DOB: [REDACTED] COB: Venezuela COC: Venezuela FBI: [REDACTED] FINS: [REDACTED] 6 DL: Delaware REAL ID # [REDACTED] Home Address: [REDACTED] Vehicle: [REDACTED] PEREIRA VIDAL is the registered owner and has received traffic citations in this vehicle. Work: Bank of America Booked: DVD Last Entry into the United States (U.S.): PEREIRA VIDAL was last admitted to the United States at New York, New York (JFK) on or about October 25, 2017, as a nonimmigrant Visitor for Pleasure with authorization to remain in the		
Signature A 13483 ODEE	Title Deportation Officer	

U.S. Department of Homeland Security

Continuation Page for Form I-213

Alien's Name PEREIRA VIDAL, ABRAHAM IGNACIO	File Number [REDACTED] Event No: [REDACTED]	Date 03/23/2026
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United States for a temporary period not to exceed April 24, 2018.

Background:

L. DO Odee generated this lead on, PEREIRA VIDAL. PEREIRA VIDAL who was born [REDACTED] and is currently 19 years old. PEREIRA VIDAL was born in Caracas Venezuela per his nonimmigrant visa application.

PEREIRA VIDAL came to the attention of Immigration and Customs Enforcement (ICE) during routine review of ACRIME alerts. On March 04, 2026 I reviewed an ACRIME alert where PEREIRA VIDAL's biometrics matched DHS/ICE records during an arrest by the Delaware State Police. PEREIRA VIDAL was arrested for the offense of Underage Gambling by the Division of Gaming Enforcement branch of the Delaware State Police. PEREIRA VIDAL was released on bond before an immigration detainer could be lodged.

ICE record checks in DHS/ICE systems as well as DHS/ICE accessible databases, showed that PEREIRA VIDAL is a citizen and national of Venezuela, who is illegally present in the United States.

Immigration History:

PEREIRA VIDAL was last admitted to the United States at New York, New York (JFK) on or about October 25, 2017, as a nonimmigrant Visitor for Pleasure with authorization to remain in the United States for a temporary period not to exceed April 24, 2018.

On July 06, 2018, PEREIRA VIDAL submitted form I-589 application for asylum.

On August 29, 2018, USCIS determined PEREIRA VIDAL was ineligible for asylum, and referred him to an Immigration Judge. An NTA was mailed to the subject on November 27, 2018.

On April 28, 2021, PEREIRA VIDAL submitted form I-821 application for Temporary Protected Status, which was approved on October 04, 2021 until September 09, 2022

On or about August 08, 2023, an Immigration Judge approved PEREIRA VIDAL's petition to administratively close removal proceedings.

On or about November 19, 2025, TPS Designation for Venezuela was terminated.

No other immigration benefits have been applied for or received by PEREIRA VIDAL.

Subject did not return to Venezuela and did not adjust his immigration status

Criminal History:

SID: [REDACTED]
Date: 02/04/2026
Agency: Delaware State Police Division of Gaming Enforcement
Charge: Underage Gambling (DE:29:4810:00a2:M) Misdemeanor
Disposition: Pending

Date: 06/27/2025
Agency: Newark, DE Police Department
Charge: Operate MV / Windshield and Windows Do Not Meet FMVSS 205 (Tinted Windshield) (DE:21:4802:00a1:c)
Disposition: Guilty

Based on the above-mentioned information, it was determined PEREIRA VIDAL, is illegally present in the U.S. and is deportable.

Signature A 13483 ODEE	Title Deportation Officer
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U.S. Department of Homeland Security

Continuation Page for Form I-213

Alien's Name PEREIRA VIDAL, ABRAHAM IGNACIO	File Number [REDACTED] Event No: [REDACTED]	Date 03/23/2026
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On February, 04 2026, a Fugitive Operation Worksheet (FOW) was generated including photograph available in DHS/ ICE systems and a I-200 Warrant of Arrest was issued for the Target.

Arrest:
On March 23, 2026, at 4:30 a.m., DO Odee and DO McBee reviewed the above-mentioned work folder and target worksheet. We were dressed in issued tactical vest, agency insignia/badges, Police panels identifying us as ICE/ERO/LE Officers, and driving unmarked government issued vehicles installed with emergency Red/ Blue lights and sirens.

At approximately 5:30 a.m., officers conducted surveillance at the above-mentioned address. Officers saw a [REDACTED]

At approximately 7:40 a.m., DO Odee and DO McBee observed an adult male who matched the physical description and prior immigration photos of PEREIRA VIDAL leaving the residence and walking to the Tesla. The adult male who matched the physical description and prior immigration photos of PEREIRA VIDAL got into the driver seat of the Tesla and drove away.

The vehicle was followed until it was safe to make a vehicle stop. Officers followed the Tesla and activated emergency equipment - red/blue lights and sirens. PEREIRA VIDAL stopped at the corner of E Cleveland Ave & McKees Lane in Newark, DE.

Officers exited their vehicle and approached the driver, identifying themselves as " Police and ICE" to the adult male driver. The Target was asked if he was PEREIRA VIDAL. The Target affirmed he was the intended target and identified himself by his own verbal admissions. He presented his Delaware Driver's License bearing the name and photo of the target.

The Target was directed to open his door to which he complied. Officers asked PEREIRA VIDAL to step out of his vehicle, turn around, and placed his hands behind his back. Officers applied handcuffs, checked for fit, and double locked.

A Search incident to arrest was conducted with negative results.

A short time later, PEREIRA VIDAL was transferred to full restraints for transport.

PEREIRA VIDAL was transported to the Dover sub-office for processing.

The Automated Biometric Fingerprint Identification System "IDENT" and Integrated Automated Fingerprint Identification System "IAFIS" were utilized and compared the subject's fingerprints to those contained in these databases. The results confirmed the subject's identity as PEREIRA VIDAL a citizen and national of Venezuela under [REDACTED]

Charge:
Section 237(a)(1)(B) of the Immigration and Nationality Act (Act), as amended, in that after admission as a nonimmigrant under Section 101(a)(15) of the Act, you have remained in the United States for a time longer than permitted, in violation of this Act or any other law of the United States.

Miscellaneous Information:
The subject was given access to a phone per ICE policy.
The subject has not served in the United States military.
The subject was advised of their right to speak to a consulate officer from Venezuela and consular notification is not mandatory.

Signature A 13483 ODEE	Title Deportation Officer
---------------------------	------------------------------

U.S. Department of Homeland Security

Continuation Page for Form I-213

Alien's Name PEREIRA VIDAL, ABRAHAM IGNACIO	File Number [REDACTED] Event No: [REDACTED]	Date 03/23/2026
The subject stated that he has no fear of persecution or torture if removed to Venezuela. The subject has no new immigration petitions or applications pending. The target claims to be to be in good medical condition and taking no medication. Processing Disposition: PEREIRA VIDAL was served a Warrant of Arrest for Alien, Form I-200. A Notice to EOIR: Alien Address, Form I-830E, will be served once PEREIRA VIDAL arrives at the Moshannon Valley Processing Center. Officers also provided PEREIRA VIDAL with the most recent version of the EOIR's list of pro bono legal service providers for New Jersey and Pennsylvania. OTHER IDENTIFYING NUMBERS ----- ALIEN- [REDACTED] State Criminal Number/State Bureau [REDACTED] (UNITED STATES) Driver's license issued as REAL ID compliant- [REDACTED] (UNITED STATES)		
Signature A 13483 ODEE	Title Deportation Officer	

5 of 5 Pages

U.S. Department of Homeland Security

Notice to Appear

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

File No. [REDACTED]

In the Matter of:

Respondent:

ABRAHAM IGNACIO PEREIRA VIDAL

currently
residing
at:

(Number, street, city and ZIP code)

(Area code and phone number)

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

The Department of Homeland Security alleges that:

1. You are not a citizen or national of the United States.
2. You are a native of Venezuela and a citizen of Venezuela and Spain
3. You were admitted to the United States at JFK International Airport, NY on 10/25/2017 as a nonimmigrant B-2 visitor with authorization to remain in the United States for a temporary period not to exceed 4/24/2018
4. You remained in the United States beyond 4/24/2018 without authorization from the Immigration and Naturalization Service or its successor the Department of Homeland Security

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:

Section 237 (a) (1) (B) of the Immigration and Nationality Act (Act), as amended, in that after admission as a nonimmigrant under Section 101(a) (15) of the Act, you have remained in the United States for a time longer than permitted.

☐ 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:

EOIR, Immigration Court, 900 Market Street, Suite 504, Philadelphia, PA 19107

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

on 04 APR 2019 at 08:30 to show why you should not be removed from the United States based on the

(Date)

(Time)

change(s) set forth above.

[Signature]
 (Signature and Title of Issuing Officer)

Date: NOV 14 2018

Lyndhurst NJ

(City and State)

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 under 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, which 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 and that you are inadmissible or removable on the charges contained in the Notice to Appear. 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 departure voluntarily. You will be given a reasonable opportunity to make any such application to the immigration judge.

Failure to appear: You are required to provide the DHS, in writing, with your full mailing address and telephone number. You must notify the Immigration Court and the Department of Homeland Security 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 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 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 (the Act).

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

Request for Prompt Hearing

To expedite a determination in my case, I request this Notice to Appear be filed with the Executive Office of 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 127 NOV 2018 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 _____ 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.

(Signature of Respondent if Personally Served)

(Signature and Title of Officer)

U.S. DEPARTMENT OF HOMELAND SECURITY

Warrant for Arrest of Alien

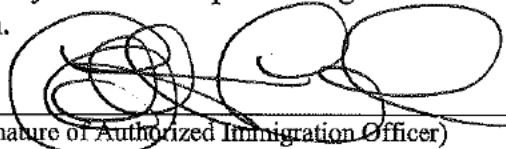
File No. [REDACTED]Date: 02/04/2026

To: Any immigration officer authorized pursuant to sections 236 and 287 of the Immigration and Nationality Act and part 287 of title 8, Code of Federal Regulations, to serve warrants of arrest for immigration violations

I have determined that there is probable cause to believe that See I-831 is removable from the United States. This determination is based upon:

- ☒ the execution of a charging document to initiate removal proceedings against the subject;
- ☐ the pendency of ongoing removal proceedings against the subject;
- ☐ the failure to establish admissibility subsequent to deferred inspection;
- ☒ biometric confirmation of the subject's identity and a records check of federal databases that affirmatively indicate, by themselves or in addition to other reliable information, that the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law; and/or
- ☐ statements made voluntarily by the subject to an immigration officer and/or other reliable evidence that affirmatively indicate the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law.

YOU ARE COMMANDED to arrest and take into custody for removal proceedings under the Immigration and Nationality Act, the above-named alien.


(Signature of Authorized Immigration Officer)

CHRISTIAN CIARROCCHI - SDDO

(Printed Name and Title of Authorized Immigration Officer)

Certificate of Service

I hereby certify that the Warrant for Arrest of Alien was served by me at null
(Location)

on See I-831 on 03/23/2026, and the contents of this
(Name of Alien) (Date of Service)

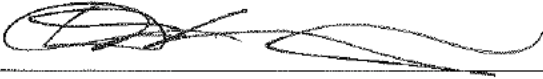
notice were read to him or her in the English language.
(Language)

Do Odee
Name and Signature of Officer

null
Name or Number of Interpreter (if applicable)

U.S. Department of Homeland Security

Continuation Page for Form I-200

Alien's Name PEREIRA VIDAL, ABRAHAM IGNACIO	File Number [REDACTED] Event No: [REDACTED]	Date 02/04/2026	
NAME ----- PEREIRA VIDAL, ABRAHAM IGNACIO NAME OF ALIEN ----- PEREIRA VIDAL, ABRAHAM IGNACIO			
Signature CIARROCCHI, CHRISTIAN 			Title SDDO

DEPARTMENT OF HOMELAND SECURITY
NOTICE OF CUSTODY DETERMINATION

Alien's Name: PEREIRA VIDAL, ABRAHAM IGNACIOA-File Number: [REDACTED]Date: 03/23/2026Event ID: [REDACTED]Subject ID: [REDACTED]

Pursuant to the authority contained in section 236 of the Immigration and Nationality Act and part 236 of title 8, Code of Federal Regulations, I have determined that, pending a final administrative determination in your case, you will be:

☒ Detained by the Department of Homeland Security.

☐ Released (check all that apply):

☐ Under bond in the amount of \$ _____

☐ On your own recognizance.

☐ Under other conditions. [Additional document(s) will be provided.]

BROCKSON, T-9818

[Signature]
Name and Signature of Authorized Officer

03/23/2026 11:10 AM

Date and Time of Custody Determination

U.S. IMMIGRATION & CUSTOMS ENFORCEMENT DRO - Dover, DE Sub Office
210 Beiser Blvd DOVER, DE US 19904

(A) SDDO

Title

Office Location/Address

You may request a review of this custody determination by an immigration judge.

☒ I acknowledge receipt of this notification, and

☒ I do request an immigration judge review of this custody determination.

☐ I do not request an immigration judge review of this custody determination.

[Signature]

Signature of Alien

03/23/2026

Date

The contents of this notice were read to PEREIRA VIDAL, ABRAHAM IGNACIO in the ENGLISH language.
(Name of Alien) (Name of Language)

ODEE, A 13483

[Signature]
Name and Signature of Officer

null

Name or Number of Interpreter (if applicable)

Deportation Officer

Title



COPY

Geraldine Richardson
Acting Regional Counsel
Troy Leitzel
Counsel
U.S. Department of Homeland Security
900 Market Street, Suite 346
Philadelphia, PA 19107
(267) 479-3500

DETAINED



**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
PHILADELPHIA, PENNSYLVANIA**

In the Matter of

PEREIRA VIDAL, ABRAHAM IGNACIO

In Removal Proceedings

File No.: [REDACTED]

Immigration Judge: Hon. Dawn Kulick

Next hearing date: N/A

**U.S. DEPARTMENT OF HOMELAND SECURITY
EMERGENCY MOTION TO RECALENDAR**

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
PHILADELPHIA, PENNSYLVANIA**

In the Matter of

PEREIRA VIDAL, ABRAHAM IGNACIO

In Removal Proceedings

File No.: [REDACTED]

**U.S. DEPARTMENT OF HOMELAND SECURITY
EMERGENCY MOTION TO RECALENDAR**

The U.S. Department of Homeland Security (Department) hereby respectfully moves to urgently recalendar the above-captioned matter. The case administratively closed on August 8, 2023. On March 23, 2026, respondent was detained by ICE ERO at the Philadelphia Federal Detention Center subject to immigration proceedings. Accordingly, for the foregoing reasons and for good cause shown, DHS respectfully requests that the instant motion be granted as an emergency motion.

Based on the foregoing, DHS respectfully requests that the court grant the instant emergency motion to recalendar proceedings.

Date: March 30, 2026

Respectfully submitted,

TROY E LEITZEL Digitally signed by TROY E LEITZEL
Date: 2026.03.30 07:25:08 -04'00'

Troy Leitzel
Counsel
Office of the Principal Legal Advisor - Philadelphia

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
PHILADELPHIA, PENNSYLVANIA**

In the Matter of Abraham Ignacio Pereira Vidal

ORDER OF THE IMMIGRATION JUDGE

Upon consideration of the **DHS EMERGENCY MOTION TO RECALENDAR**, it is
HEREBY ORDERED THAT THE MOTION BE

☐ **GRANTED** ☐ **DENIED** because:

- ☐ DHS does not oppose the motion.
- ☐ The respondent does not oppose the motion.
- ☐ A response to the motion has not been filed with the court.
- ☐ Good cause has been established for the motion.
- ☐ The court agrees with the reasons stated in the opposition to the motion.
- ☐ The motion is untimely per _____
- ☐ Other:

Deadlines:

- ☐ The application(s) for relief must be filed by _____.
- ☐ The respondent must comply with DHS biometrics instructions by _____.

Hon. Dawn Kulick
U.S. Immigration Judge

Certificate of Service

This document was served by: ☐ Mail ☐ Personal Service

To: ☐ Alien ☐ Alien c/o Custodial Officer ☐ Alien's Atty/Rep ☐ DHS

Date: _____ By: Court Staff _____

CERTIFICATE OF SERVICE

CASE NAME: Abraham Ignacio Pereira Vidal

File No.: [REDACTED]

I HEREBY CERTIFY that, on March 30, 2026, I caused to be served the attached
DHS MOTION TO RECALENDAR:

 X by placing a true copy thereof and preparing to be mailed in a sealed envelope, with
postage thereon fully prepaid and causing the same to be mailed by first-class mail
to the person(s) at the addresses set forth below.

 by causing to be personally served to the person set forth below in court

 by FEDERAL EXPRESS: AIRBORNE EXPRESS to the person at the address set
forth below.

 by telefaxing with acknowledgment of receipt to the person at the address set forth
below.

Seth A. Lupton, Esq.
Lupton Law LLC
882 S. Matlack Street, Suite 106
West Chester, PA 19382

I declare under penalty of perjury that the foregoing is true and correct.

Executed March 30, 2026.

TROY E LEITZEL

Digitally signed by TROY E
LEITZEL
Date: 2026.03.30 07:28:14 -04'00'

Troy Leitzel
Counsel
U.S. Department of Homeland Security
Office of the Principal Legal Advisor - Philadelphia

Geraldine Richardson
Acting Regional Counsel
Troy Leitzel
Counsel
U.S. Department of Homeland Security
900 Market Street, Suite 346
Philadelphia, PA 19107
(267) 479-3500

DETAINED



COPY



UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
PHILADELPHIA, PENNSYLVANIA

In the Matter of

PEREIRA VIDAL, ABRAHAM IGNACIO

Lead:

Riders:

In Removal Proceedings

File No. [REDACTED]

Immigration Judge: Hon. Dawn Kulick

Next hearing date: N/A

U.S. DEPARTMENT OF HOMELAND SECURITY
MOTION TO SEVER

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
PHILADELPHIA, PENNSYLVANIA**

In the Matter of

PEREIRA VIDAL, ABRAHAM IGNACIO

File No. [REDACTED]

Lead: [REDACTED]

Riders: [REDACTED]

In Removal Proceedings

**U.S. DEPARTMENT OF HOMELAND SECURITY
MOTION TO SEVER**

The U.S. Department of Homeland Security (Department) hereby respectfully moves to sever respondent's removal proceedings from the non-detained lead [REDACTED] and riders [REDACTED]. Respondent's case was consolidated with the lead and other riders and was administratively closed on August 8, 2023. On March 23, 2026, respondent was detained by ICE ERO at the Philadelphia Federal Detention Center subject to immigration proceedings.

The other joined respondents are not detained and remain in this Court's AOR, therefore this case should be separated from those of the non-detained co-respondents and this case should be adjudicated separately.

Based on the foregoing, DHS respectfully requests that the court grant the motion to sever this respondent from the non-detained lead and other riders.

Date: March 30, 2026

Respectfully submitted,

TROY E LEITZEL Digitally signed by TROY E LEITZEL
Date: 2026.03.30 07:21:52 -04'00'

Troy Leitzel

Counsel

Office of the Principal Legal Advisor - Philadelphia

UNITED STATES DEPARTMENT OF JUSTICE EXECUTIVE OFFICE FOR
IMMIGRATION REVIEW IMMIGRATION COURT PHILADELPHIA,
PENNSYLVANIA

In the Matter of Abraham Ignacio Pereira Vidal

ORDER OF THE IMMIGRATION JUDGE

Upon consideration of the **DHS MOTION TO SEVER**, it is HEREBY ORDERED THAT
THE MOTION BE

☐ **GRANTED** ☐ **DENIED** because:

- ☐ DHS does not oppose the motion.
- ☐ The respondent does not oppose the motion.
- ☐ A response to the motion has not been filed with the court.
- ☐ Good cause has been established for the motion.
- ☐ The court agrees with the reasons stated in the opposition to the motion.
- ☐ The motion is untimely per _____
- ☐ Other:

Deadlines:

- ☐ The application(s) for relief must be filed by _____.
- ☐ The respondent must comply with DHS biometrics instructions by _____.

Hon. Dawn Kulick
U.S. Immigration Judge

Certificate of Service

This document was served by: ☐ Mail ☐ Personal Service

To: ☐ Alien ☐ Alien c/o Custodial Officer ☐ Alien's Atty/Rep ☐ DHS

Date: _____ By: Court Staff _____

CERTIFICATE OF SERVICE

CASE NAME: Abraham Ignacio Pereira Vidal

File No.: [REDACTED]

I HEREBY CERTIFY that, on March 30, 2026, I caused to be served the attached
DHS MOTION TO SEVER:

 X by placing a true copy thereof and preparing to be mailed in a sealed envelope, with
postage thereon fully prepaid and causing the same to be mailed by first-class mail
to the person(s) at the addresses set forth below.

 by causing to be personally served to the person set forth below in court

 by FEDERAL EXPRESS: AIRBORNE EXPRESS to the person at the address set
forth below.

 by telefaxing with acknowledgment of receipt to the person at the address set forth
below.

Seth A. Lupton, Esq.
Lupton Law LLC
882 S. Matlack Street, Suite 106
West Chester, PA 19382

I declare under penalty of perjury that the foregoing is true and correct.

Executed March 30, 2026.

TROY E LEITZEL Digitally signed by TROY E LEITZEL
Date: 2026.03.30 07:22:49 -04'00'

Troy Leitzel
Counsel
U.S. Department of Homeland Security
Office of the Principal Legal Advisor - Philadelphia