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March 30, 2026

VIA ECF FILING

Honorable Joshua D. Wolson
Judge, United States District Court
5118 United States Courthouse
601 Market Street
Philadelphia, PA 19106-1744

**Re: Ramon Villarreal Torres v. J.L. Jamison, Federal
Detention Center, Philadelphia, *et al.*
Civil Action No. 2:26-cv-02000-JDW**

Dear Judge Wolson:

Please accept this letter brief in response to the Court's March 27, 2026 Order that Respondents advise the Court whether they oppose Mr. Torres' Petition and, if so, whether they intend to make any arguments other than those the Government made in *Kashranov v. J.L. Jamison*, Case No. 2:25-cv-05555-JDW, 2025 WL 3188399 (E.D. Pa. Nov. 14, 2025) and *Olimov v. Jamison*, No. 26-cv-532-JDW, 2026 WL 596155 (E.D. Pa. Mar. 3, 2026)." Dkt. No. 2.

Respondents oppose the Petition. This matter is legally and factually distinguishable from the recent cases decided by this Court, including those the Court mentions above. Petitioner is subject to mandatory detention under **8 U.S.C. § 1225(b)(1) [not 1225(b)(2)(A)]** because he was initially processed for **expedited removal** when he attempted to enter the United States without authorization. That Petitioner is no longer in expedited removal proceedings under § 1225 and is now in standard removal proceedings under

§ 1229a does not change the statutory basis for detention.¹ Petitioner is returned to his “detention status” when his parole ends.

In this case, DHS processed Petitioner for expedited removal pursuant to 8 U.S.C. § 1225(b)(1) after he entered the United States without inspection. Petitioner claimed a fear of return to his home country and ultimately DHS placed him into standard removal proceedings under 8 U.S.C. § 1229a. He was paroled into the United States pursuant to 8 U.S.C. § 1182(d)(5) to facilitate this process. This parole has since terminated and Petitioner has now returned to his detention status at the time of his parole—*i.e.*, mandatory detention under § 1225(b)(1). The Court should accordingly deny the petition for a writ of habeas corpus.

Consequently, Respondents request additional time, until Thursday, April 2, 2026 to file its full brief in this matter.

Respectfully submitted,

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ANTHONY ST. JOSEPH
Assistant United States Attorney

cc: Caitlin Barry, Esq.

¹ Multiple district courts in this jurisdiction have rejected this argument. *See e.g.* *Talabadze v. Rose, et al.*, No. 26-cv-360 (E.D. Pa Jan. 30, 2026) (Perez, J.); *Seminario-Marcos v. Jamison, et al.*, No. 26-cv-421 (E.D. Pa Feb. 6, 2026) (Kearney, J.); *Vazquez-Diaz v. Rose, et al.*, No. 26-cv-342 (E.D. Pa Feb. 10, 2026) (Gallagher, J.); *Vargas- Quajada v. Jamison, et al.*, 26-cv-914 (E.D. Pa. Feb. 17, 2026 (McHugh, J.); *Nawab Ali v. Jamison, et al.*, No. 26-cv-729 (E.D. Pa. Feb. 19, 2026) (Quinones-Alejandro, J.); *Zavala Ulloa v. Jamison, et al.*, No. 26-cv-823 (E.D. Pa. Feb. 20, 2026) (Marston, J.); *Green v. Jamison, et al.*, No. 26-0773 (E.D. Pa. Feb. 26 2026)(Scott, J.).