



CLINICAL PROGRAM
CHARLES WIDGER SCHOOL of LAW

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,

Counsel for Petitioner submits this letter in opposition to the Respondent's request for an extension of time to file an Answer to the Petition. As Respondents state, multiple courts in this jurisdiction have rejected Respondents' argument; in fact, no judge in this court has ever agreed that this argument has merit. Respondents allege, without any supporting evidence, that Respondents previously placed Petitioner in expedited removal proceedings, and then re-categorized him into standard removal proceedings. Respondents argue that the fact that Petitioner is in standard removal proceedings does not impact the category of detention that he falls under. As this argument has been fully briefed and ruled upon by at least 7 judges in the Eastern District, each of whom has rejected it, there is no reason for this Court to disturb that sound analysis.

In several the decisions cited by Respondents, the alleged expedited removal paperwork was eventually found to be nonexistent, unsigned, or otherwise procedurally deficient. See e.g. *Seminario-Marcos v. Jamison, et al.*, No. 26-cv-421 (E.D. Pa Feb. 6, 2026) (Kearney, J.) ("Respondents did not adduce evidence of a valid expedited removal process after notice at several stages.")

Even if the expedited removal categorization is found to be valid, "because § 1225(b)(1)(A)(iii)(II) applies only to individuals **'who have not been ... paroled,'** the plain language of the statute clearly and unambiguously shows that § 1225(b)(1)(A)(iii) cannot serve as the basis for Petitioner's detention." *Rivas Rodriguez v. Rokosky*, No. CV 25-17419 (CPO), 2025 WL 3485628, at *2 (D.N.J. Dec. 3, 2025) (emphasis added).



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As this argument has been repeatedly rejected by courts in this district, and as Petitioner's detention away from his family continues to constitute an egregious deprivation of liberty in violation of his right to due process, the request for an extension of time to file an Answer should be denied.

Sincerely,

/s/Caitlin Barry
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