

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Henry Adonay Marroquin Crespin

Petitioner,

v.

Matthew Elliston, *et al.*,

Respondents.

Case No. 1:26-cv-01381-SAG

JOINT NOTICE

Petitioner and Respondents, by and through undersigned counsel, hereby submit the following Notice to the Court regarding the Petition for Habeas Corpus in lieu of further briefing.

The Parties submit that the factual and legal issues presented in the instant habeas petition do not differ in any material fashion from those presented in *Maldonado de Leon v. Baker*, No. 25-3084-TDC, 2025 WL 2968042 (D. Md. Oct. 21, 2025), and *Villanueva Funes v. Noem*, No. 25-cv-03860-TDC, 2026 WL 92860 (D. Md. Jan. 13, 2026). Specifically, as in those cases, the Petition here concerns whether an alien who is present in the United States without admission is properly subject to mandatory detention (*i.e.*, detention without the prospect of release on bond) pursuant to 8 U.S.C. § 1225(b) during the pendency of his administrative removal proceedings. As such, unless the Court prefers further briefing on that issue, the Parties submit that this Court should incorporate the Respondents' filings in *Maldonado de Leon* and *Villanueva Funes* into the record of this habeas action in lieu of further briefing. Respondents ask that the Court consider the arguments made by the Government in *Maldonado de Leon* and *Villanueva Funes*, including all jurisdictional arguments, as if they were presented by Respondents in an Answer filed in this

case.

Should the Court be inclined to grant relief to Petitioner in this case, the Parties request that the Court enter an Order: (1) finding that Petitioner is detained pursuant to 8 U.S.C. § 1226(a) and is entitled to, and shall seek, a bond hearing pursuant to the regulations provided at 8 C.F.R. § 236.1(d), 8 C.F.R. § 1003.19 and 8 C.F.R. § 1236.1(d); (2) that the bond hearing occur within ten days of Petitioner's filing such request and the bond hearing be conducted pursuant to 8 U.S.C. § 1226(a); and (3) requiring that any bond hearing for Petitioner be conducted in an Immigration Court with jurisdiction, or with administrative control, over Petitioner's detention.

Dated: April 9, 2026

Respectfully submitted,

/s/ Audrey Georgia Vorhees
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Counsel for Respondents

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of April, 2026, a copy of the foregoing Joint Notice was served electronically on all parties and counsel receiving service via CM/ECF in this case.

/s/ Kristy Burkhardt
Kristy Burkhardt
Special Assistant United States Attorney