

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

3:26-cv-01013- MMH-MCR

OSCAR AMADO SALES-LOPEZ,

Petitioner,

V.

WARDEN of the Florida Baker Correctional Institute;
TODD M. LYONS, in his official capacity as Acting
Director of the Immigration and Customs Enforcement,
Enforcement and Removal Operations Washington Field
Office; MARKWAYNE MULLIN, in his official
capacity as Secretary of the Department of Homeland
Security; TODD BLANCHE, in his official capacity as
Attorney General of the United States,

**PETITIONER'S REPLY TO
RESPONDENT'S AMENDED
RESPONSE**

Respondents.

Given Respondents' concession that Petitioner is detained under § 1226(a) and is entitled to seek an individualized bond hearing, Petitioner will not further press separate argument on the request for a preliminary injunction or TRO at this time. Respondents themselves submit that, because the habeas petition may be granted, the Court "may not need" to provide duplicative preliminary-injunction relief. However, the case is not moot until Petitioner actually receives a § 1226(a) individualized bond hearing.

The Court should therefore enter an order granting the petition on the statutory ground and directing that a prompt bond hearing occur, with a firm deadline and retained jurisdiction to ensure compliance. Respondents acknowledge binding Eleventh Circuit authority and do not contest the Court's authority to order a § 1226(a) bond hearing, requesting seven days to arrange it.

WHEREFORE, Petitioner, OSCAR AMADO SALES-LOPEZ, respectfully requests that this Honorable Court grant the instant Petition and Order the Respondents to provide the Petitioner with a Bond Hearing within the meaning of 8 U.S.C. § 1226(a).

Respectfully Submitted,

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By: /s/ Juan C. Mercado
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21th day of May 2026, I electronically filed the foregoing with the clerk of court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

Respectfully Submitted,

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