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Steven K. Ridgill (SBN 338535)  
LAW OFFICE OF JUDITH L. WOOD  
201 S. Santa Fe Avenue, Suite 101  
Los Angeles, CA 90012  
Tel : (213) 680-7801  
Email : Steven@judy-wood.com  
*Attorney for Petitioner, AMANDA DA SILVA*

**DETAINED**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

AMANDA DA SILVA, an individual,  
  
Petitioner,  
  
v.

Case No.: '26CV2645 BJC MMP


**PETITION FOR WRIT OF HABEAS  
CORPUS (28 U.S.C. § 2241, ALIEN  
DETAINEE)**

TODD M. LYONS, Acting Director, U.S.  
Immigration and Customs Enforcement;  
MARCOS CHARLES, Acting Executive  
Associate Director, Enforcement and  
Removal Operations, U.S. Immigration  
and Customs Enforcement;  
MARKWAYNE MULLIN, Secretary,  
U.S. Department of Homeland Security;  
TODD BLANCHE, U.S. Attorney  
General; and DOE 1, Warden of Imperial  
Regional Detention Facility,

Agency file no.: Unknown

Respondents.


1 **TO THE HONORABLE COURT AND TO THE PARTIES AND THEIR**  
2 **COUNSEL OF RECORD:**

3 **PLEASE TAKE NOTICE** that Petitioner AMANDA DA SILVA  
4  
5 (“Petitioner”), A-Number *Unknown or Not Yet Assigned*, a citizen of Brazil, born  
6  by and through her attorneys hereby petitions the Court for a Writ of  
7 Habeas Corpus, pursuant to Art. I, § 9, cl. 2 of the United States Constitution; 28  
8 U.S.C. § 2241; 28 U.S.C. § 1331; and 28 U.S.C. § 1651; and 28 U.S.C. §§2201,  
9 2202, and for the following relief: (1) Issue a writ of habeas corpus pursuant to 28  
10 U.S.C. § 2241 ordering Respondents to release Petitioner from civil immigration  
11 custody upon reasonable conditions of supervision; (2) Issue an order enjoining  
12 Respondents from removing or transferring Petitioner from the Southern District of  
13 California without prior notice to this Court and to Petitioner’s counsel, and from  
14 executing any order of removal pending adjudication of this petition; (3)  
15  
16 Alternatively, issue an order directing Respondents to provide Petitioner within  
17 three (3) days a bond hearing before an Immigration Judge at which jurisdiction  
18 shall be deemed established and the government bears the burden of proving by  
19 clear and convincing evidence that Petitioner poses a danger or a flight risk  
20 sufficient to justify continued detention; (4) Alternatively, issue an order directing  
21 Respondents to permit Petitioner to withdraw her application for admission and  
22 depart voluntarily pursuant to INA § 235(a)(4) and 8 C.F.R. § 235.4, in lieu of  
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1 issuance or execution of any expedited removal order; (5) Award Petitioner her  
2 reasonable attorneys' fees and costs pursuant to the Equal Access to Justice Act, 28  
3 U.S.C. § 2412; and (6) Grant such other and further relief as this Court deems just  
4 and proper.  
5

### 6 INTRODUCTION

7  
8 1. Petitioner Amanda Da Silva is a twenty-three-year-old Brazilian  
9 national held in civil immigration custody at the Imperial Regional Detention  
10 Facility, 1572 Gateway Road, Calexico, California 92231. Ms. Da Silva is the  
11 fiancée of United States citizen Joseph Foster, who has prepared a K-1  
12 nonimmigrant visa petition on her behalf. She has no criminal history of any kind.  
13

14 2. Ms. Da Silva's detention is unlawful and unconstitutional on two  
15 independent grounds. First, she is a survivor of  who  
16 already suffered from serious trauma-related psychological conditions at the time of  
17 her apprehension; her detention has dramatically worsened those conditions, and  
18 she is now experiencing active suicidal ideation as documented by a licensed  
19 psychologist who evaluated her in custody. The government's continued  
20 confinement of a civil detainee in acute psychiatric crisis, in a facility incapable of  
21 providing the level of care her condition demands, violates the substantive due  
22 process guarantee of the Fifth Amendment. Second, Ms. Da Silva has not received  
23 an individualized bond hearing or any meaningful custody determination before a  
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1 neutral adjudicator, in violation of procedural due process.

2 3. Each of these violations independently requires her immediate release.  
3 Taken together, they compel it. Ms. Da Silva respectfully petitions this Court for a  
4 writ of habeas corpus ordering her immediate release from custody, and moves on  
5 an emergency basis for a temporary restraining order directing Respondents to  
6 release her forthwith pending full adjudication of this petition.  
7

8  
9 **CUSTODY**


10 4. Petitioner is currently being held by the U.S. Immigration and  
11 Customs Enforcement, Enforcement and Removal Operations (ERO) at Imperial  
12 Regional Detention Facility, 1572 Gateway Road, Calexico, California 92231.  
13

14 **JURISDICTION AND VENUE**

15 5. This Court has jurisdiction under 28 U.S.C. § 2241(c)(3) because  
16 Petitioner is in custody in violation of the Constitution and laws of the United  
17 States.  
18

19 6. Venue is proper in the Southern District of California pursuant to 28  
20 U.S.C. §§ 1391 and 2242 because Petitioner is detained by Respondents within this  
21 District.  
22

23 **PARTIES**

24 7. Petitioner, Amanda Da Silva (A-Number unknown or not yet  
25 assigned), a citizen of Brazil, having a date of birth of  is currently  
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1 detained by Respondents at a federal facility within Imperial County, California.

2 She has been in Respondents' custody since at least on or around July 1, 2025.

3 8. Respondent Todd M. Lyons is the Acting Director of U.S.  
4 Immigration and Customs Enforcement (ICE). He is a legal custodian of Petitioner  
5 and is named in his official capacity.  
6

7 9. Respondent Marcos Charles is the Acting Executive Associate  
8 Director of Enforcement and Removal Operations for U.S. Immigration and  
9 Customs Enforcement (ICE). He is a legal custodian of Petitioner and is named in  
10 his official capacity.  
11


12 10. Respondent Markwayne Mullin is the Secretary of the United States  
13 Department of Homeland Security (DHS). He is a legal custodian of Petitioner and  
14 is named in his official capacity.  
15

16 11. Respondent Todd Blanche is the acting Attorney General of the United  
17 States Department of Justice. He is a legal custodian of Petitioner and is named in  
18 his official capacity.  
19

20 12. Respondent DOE 1 is the Warden of the Imperial Regional Detention  
21 Facility, 1572 Gateway Road, Calexico, California 92231. He is a legal custodian  
22 of Petitioner and is named in his official capacity. Respondent DOE 1 is sued under  
23 said fictitious name given the unavailability of public information regarding his or  
24 her identity. On information and belief, DOE 1 is believed to be agent or employee  
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1 of the other Respondents. Upon discovery of the identity of Respondent DOE 1,  
2 Petitioner will seek leave to amend this Petition to provide the correct name.

3 **STATEMENT OF FACTS**  
4

5 13. Petitioner Amanda Da Silva is a citizen of Brazil, born 

6 She has no criminal history in Brazil, the United States, or any other country.

7 14. Ms. Da Silva is engaged to be married to Joseph Foster, a United  
8 States citizen. Mr. Foster and Ms. Da Silva met through an online platform in June  
9 2025, communicated daily, and met in person in September 2025 when Mr. Foster  
10 traveled to South America. On September 15, 2025, Mr. Foster proposed marriage  
11 to Ms. Da Silva in Gramado, Brazil, and she accepted. The couple lived together in  
12 Brazil for several months in cities including Caxias do Sul, Porto Alegre, and  
13 Florianópolis while Mr. Foster financially supported Ms. Da Silva and developed a  
14 relationship with her son.  
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18 15. Mr. Foster has prepared K-1 fiancé visa petition paperwork and  
19 intended to file that petition to regularize Ms. Da Silva's status in the United States.  
20 The completed K-1 paperwork was in Mr. Foster's vehicle at the time of Ms. Da  
21 Silva's apprehension.  
22

23 16. Mr. Foster suffers from severe venous ulcers in his leg requiring daily  
24 elevation, assistance with daily tasks, and surgical intervention recommended by a  
25 vascular surgeon. Ms. Da Silva served as Mr. Foster's primary caregiver in Brazil.  
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1 He requires her assistance to manage his medical condition.

2 17. Following their stay in Brazil, Mr. Foster and Ms. Da Silva relocated  
3 to Tijuana, Mexico, with the plan that Mr. Foster would commute to work in San  
4 Diego and return to Mexico daily while the couple pursued the K-1 visa process.  
5 On or about March 26, 2026, Ms. Da Silva arrived at the United States border in the  
6 San Diego area to accompany Mr. Foster. She was encountered by U.S. Customs  
7 and Border Protection officers, questioned, and taken into custody.  
8  
9

10 18. Ms. Da Silva is a survivor of [REDACTED]  
11 perpetrated by a family member in Brazil. She suffered the [REDACTED]  
12 [REDACTED] She was adopted and subsequently  
13 experienced abandonment by her adoptive family. These experiences have left her  
14 with profound, chronic, and clinically significant psychological trauma, including  
15 severe anxiety, post-traumatic symptomatology, and fear of abandonment.  
16  
17

18 19. While detained at Imperial County Jail under an ICE detainer, Ms. Da  
19 Silva was evaluated by a licensed psychologist. That evaluation documented that  
20 Ms. Da Silva's pre-existing trauma has been dramatically exacerbated by the  
21 conditions of her detention, and that she has begun experiencing active suicidal  
22 ideation.  
23

24 20. Ms. Da Silva is now in the direct custody of ICE/ERO at the Imperial  
25 Regional Detention Facility. Upon information and belief, that facility does not  
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1 provide psychiatric care adequate to address active suicidal ideation and acute  
2 trauma-related crisis. Ms. Da Silva's mental health continues to deteriorate. The risk  
3 that she will harm or kill herself while in Respondents' custody is real, immediate,  
4 and escalating.

5  
6 21. Upon information and belief, Ms. Da Silva has not been afforded an  
7 individualized bond hearing before a neutral adjudicator. She has not been given a  
8 meaningful opportunity to present evidence regarding her flight risk, ties to her  
9 fiancé, lack of criminal history, and the humanitarian circumstances of her case.  
10 She has been detained since her apprehension without any process adequate to  
11 justify continued detention of a person in acute psychiatric crisis.  
12

13  
14 22. Through counsel, Ms. Da Silva has formally offered to depart the  
15 United States voluntarily pursuant to INA § 235(a)(4) and 8 C.F.R. § 235.4.  
16 Specifically, counsel's written request to ICE/ERO, transmitted on or about April  
17 23, 2026, expressly requested that Ms. Da Silva be permitted to withdraw her  
18 application for admission and depart voluntarily to Brazil in lieu of any expedited  
19 removal order. ICE/ERO has not responded to that request and has not authorized  
20 voluntary departure. *See* Letter re Voluntary Departure, **Exhibit 1**.  
21

22  
23 23. Ms. Da Silva seeks voluntary departure because she understands that  
24 an expedited removal order would subject her to a five-year bar to admission under  
25 INA § 212(a)(9)(A)(i), 8 U.S.C. § 1182(a)(9)(A)(i), which would substantially  
26

1 impair or eliminate her ability to obtain a K-1 nonimmigrant visa and pursue lawful  
2 reunification with her U.S. citizen fiancé. She is not seeking to evade removal; she  
3 is seeking to leave in a manner that preserves the lawful path forward that Congress  
4 has made available to the fiancées of U.S. citizens. ICE/ERO's refusal to permit  
5 voluntary departure — while simultaneously maintaining her in civil detention in a  
6 condition of acute psychiatric crisis — serves no legitimate regulatory purpose and  
7 is not reasonably related to any government interest in securing her departure.  
8  
9

10 24. Ms. Da Silva is currently being detained by Respondents at Imperial  
11 Regional Detention Facility, 1572 Gateway Road, Calexico, California 92231. *See*  
12 ICE Detainee Locator page, **Exhibit 2**.

13  
14 **IRREPARABLE INJURY**

15 25. Petitioner's unlawful detention inflicts irreparable harm that cannot be  
16 remedied by later judicial review. Every day of unlawful detention is an ongoing  
17 constitutional violation, which is in itself an irreparable injury. *See, e.g., Melendres*  
18 *v. Arpaio*, 695 F.3d 990, 1002 (9th Cir. 2012) (Concerning the a preliminary  
19 injunction inquiry, “[i]t is well established that the deprivation of constitutional  
20 rights ‘unquestionably constitutes irreparable injury.’”)  
21  
22

23 26. Petitioner's detention deprives him of emotional and his family of  
24 financial support, inflicting harm that monetary damages cannot repair. *See Leiva-*  
25 *Perez v. Holder*, 640 F.3d 962, 968 (9th Cir. 2011).  
26  
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1 27. Lastly, prolonged detention without cause has caused escalating  
2 anxiety, depression, and sleep disturbance for Petitioner. Courts recognize that even  
3 short-term civil detention can cause lasting psychological trauma.

4  
5 28. Because these harms are immediate, ongoing, and not compensable by  
6 money damages, the Court's intervention is necessary to prevent continuing and  
7 irreparable injury to Petitioner.

8  
9 **EXHAUSTION OF REMEDIES**

10 29. The Ninth Circuit has consistently held that exhaustion is not required  
11 where administrative remedies are inadequate, futile, or unavailable, particularly in  
12 immigration habeas cases. *Singh v. Holder*, 638 F.3d 1196, 1203 FN. 3 (9th Cir.  
13 2011); *Puga v. Chertoff*, 488 F.3d 812, 815 (9th Cir. 2007); *see also Hernandez v.*  
14 *Sessions*, 872 F.3d 976, 988-989 (9th Cir. 2017) (permitting habeas review of  
15 custody without requiring exhaustion).  
16  
17

18 30. Accordingly, Petitioner properly seeks relief in this Court because  
19 there exists no adequate administrative forum to contest his unlawful arrest and  
20 confinement, and continued detention constitutes an ongoing violation of  
21 constitutional rights.  
22

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2 **THE DETENTION IS UNLAWFUL**

3 **I. CLAIM ONE: SUBSTANTIVE DUE PROCESS — FIFTH**  
4 **AMENDMENT (Continued Detention of Civil Detainee in Acute**  
5 **Psychiatric Crisis)**

6  
7 31. Petitioner realleges and incorporates by reference all preceding  
8 paragraphs.  
9

10 32. The Fifth Amendment's Due Process Clause prohibits the federal  
11 government from depriving any person of liberty without due process of law. "It  
12 stands to reason that an individual detained awaiting civil commitment proceedings  
13 is entitled to protections at least as great as those afforded to a civilly committed  
14 individual and at least as great as those afforded to an individual accused but not  
15 convicted of a crime." *Jones v. Blanas*, 393 F.3d 918, 932 (9<sup>th</sup> Cir. 2004).  
16  
17

18 33. The government violates substantive due process when it detains a civil  
19 detainee in conditions that are not reasonably related to a legitimate governmental  
20 purpose, or that constitute punishment. *Bell v. Wolfish*, 441 U.S. 520, 535-538  
21 (1979). The government additionally violates substantive due process when it is  
22 deliberately indifferent to a detainee's serious medical or psychiatric needs. *See Frost*  
23 *v. Agnos*, 152 F.3d 1124, 1128, 1130 (9<sup>th</sup> Cir. 1998).  
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1 34. Active suicidal ideation constitutes a serious medical need. Detaining a  
2 civil immigration detainee who is actively suicidal in a facility that cannot provide  
3 adequate psychiatric care, without releasing her to an environment where such care  
4 is available, is not reasonably related to any legitimate governmental interest in  
5 maintaining her detention. It constitutes deliberate indifference to her most  
6 fundamental right: the right to life.  
7

8  
9 35. Ms. Da Silva's suicidal ideation has been documented by a licensed  
10 psychologist in Respondents' own detention system. Respondents are on notice of  
11 her condition. Their continued detention of her in inadequate conditions constitutes  
12 a violation of her rights under the Fifth Amendment's substantive due process  
13 guarantee.  
14

15 36. Continued detention will cause Ms. Da Silva irreparable harm, up to and  
16 including death. The only remedy adequate to cure this constitutional violation is her  
17 immediate release.  
18

19 **II. CLAIM TWO: PROCEDURAL DUE PROCESS — FIFTH**

20 **AMENDMENT (Absence of Individualized Custody Determination)**

21  
22 37. Petitioner realleges and incorporates by reference all preceding  
23 paragraphs.  
24

25 38. The Fifth Amendment's Due Process Clause requires that before the  
26 government may deprive a person of liberty, it must provide procedurally adequate  
27

1 process. The adequacy of that process is measured under the balancing framework of  
2 *Mathews v. Eldridge*, 424 U.S. 319 (1976): (1) the private interest affected; (2) the  
3 risk of erroneous deprivation through existing procedures; and (3) the government's  
4 interest.

5  
6 39. Petitioner's interest in physical liberty is profound and encompasses her  
7 very survival, given her psychiatric condition. The risk of erroneous deprivation is  
8 substantial: Ms. Da Silva is a nonviolent, non-criminal civil detainee with strong ties  
9 to a U.S. citizen, no flight risk indicators, and compelling humanitarian  
10 circumstances that a neutral adjudicator would weigh heavily in favor of release. The  
11 government has no countervailing interest that would justify detaining a suicidal civil  
12 detainee without any individualized hearing.

13  
14  
15 40. The Ninth Circuit has held that prolonged civil immigration detention  
16 without an individualized bond hearing violates procedural due process. *Diouf v.*  
17 *Napolitano*, 634 F.3d 1081, 1086, 1091–92 (9th Cir. 2011); *Rodriguez v. Robbins*,  
18 715 F.3d 1127, 1131–34 (9th Cir. 2013).

19  
20  
21 41. Ms. Da Silva has been detained without any individualized hearing  
22 before a neutral adjudicator at which she could present evidence of her non-  
23 dangerousness, non-flight-risk status, and humanitarian circumstances. This  
24 violation is further compounded by Respondents' refusal to authorize voluntary  
25 departure under INA § 235(a)(4): a detainee who has affirmatively offered to leave  
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1 is not a flight risk, and the government has no cognizable interest in continuing to  
2 hold her in civil detention under those circumstances. The continued detention  
3 violates her procedural due process rights under the Fifth Amendment.  
4

5 **III. CLAIM THREE: SUBSTANTIVE DUE PROCESS — PUNITIVE**  
6 **DETENTION (Refusal to Permit Voluntary Departure Renders**  
7 **Continued Detention Unreasonable)**  
8

9 42. Petitioner realleges and incorporates by reference all preceding  
10 paragraphs.

11 43. Civil immigration detention is constitutionally permissible only to the  
12 extent it is reasonably related to the government’s legitimate regulatory interest in  
13 securing an alien’s removal. *Bell v. Wolfish*, 441 U.S. 520, 538–39 (1979); *Zadvydas*  
14 *v. Davis*, 533 U.S. 678, 690–92 (2001). Detention that is not reasonably related to  
15 that purpose — or that serves no purpose a neutral observer could identify beyond  
16 causing the detainee distress — is punitive in nature and violates the Fifth  
17 Amendment’s substantive due process guarantee as applied to civil detainees.  
18  
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20 44. Ms. Da Silva has formally offered to depart voluntarily; she is asking to  
21 leave in a manner that does not permanently bar her from the K-1 visa process and  
22 lawful reunification with her U.S. citizen fiancé. INA § 235(a)(4) and 8 C.F.R. §  
23 235.4 expressly authorize ICE to permit an alien to withdraw her application for  
24 admission and depart voluntarily. Where a detainee has offered to leave, continued  
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1 detention cannot be justified as necessary to secure her departure. The only function  
2 of continued detention in these circumstances is to subject Ms. Da Silva to the  
3 collateral consequence of an expedited removal order — a five-year bar under INA  
4 § 212(a)(9)(A)(i) — which serves no regulatory goal of the immigration laws and  
5 constitutes punishment imposed without charge, hearing, or process of any kind.  
6

7 45. Respondents’ refusal to authorize voluntary departure while continuing  
8 to detain Ms. Da Silva in a condition of acute psychiatric crisis is not reasonably  
9 related to any legitimate government interest and constitutes punitive detention in  
10 violation of the Fifth Amendment. Habeas corpus relief is warranted.  
11

12  
13 **THE BALANCE OF EQUITIES AND PUBLIC INTEREST WEIGH IN**  
14 **PETITIONER’S FAVOR**

15 46. The balance of equities is not close. On one side: a young woman’s  
16 life. On the other: the government’s interest in maintaining the civil immigration  
17 detention of a nonviolent, non-criminal individual whose detention is actively  
18 causing her psychiatric deterioration. That interest is further diminished —  
19 effectively to zero — by Petitioner’s offer to depart voluntarily. A government that  
20 is detaining someone who has asked to leave cannot credibly assert a flight-risk or  
21 appearance interest in continued detention. Respondents can impose any conditions  
22 of supervision — electronic monitoring, regular check-ins, surrender of travel  
23 documents — that adequately address any residual concerns. The government loses  
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1 nothing of substance by releasing Ms. Da Silva under supervision or permitting her  
2 voluntary departure; Ms. Da Silva may lose everything by remaining in custody.

3 47. The public interest is not served by the preventable death or serious  
4 self-harm of a civil immigration detainee. Compliance with constitutional  
5 requirements and with the Fifth Amendment's guarantee against arbitrary detention  
6 is manifestly in the public interest. There is no public interest in maintaining the  
7 detention of a young woman in a mental and emotional crisis with no criminal  
8 history and a U.S. citizen fiancé who seeks to regularize her status through lawful  
9 channels.  
10  
11

12  
13 **PRAAYER FOR RELIEF**

14 WHEREFORE, Petitioner AMANDA DA SILVA respectfully requests that the  
15 Court grant the following relief:  
16

- 17 1. Issue a temporary restraining order pursuant to Fed. R. Civ. P. 65(b)  
18 directing Respondents to immediately release Petitioner Amanda Da  
19 Silva from civil immigration custody upon reasonable conditions of  
20 supervision;  
21
- 22 2. Issue an order to show cause directing Respondents to appear and  
23 show cause why a preliminary injunction should not issue maintaining  
24 that relief pending final adjudication of this petition;  
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- 26 3. Issue a writ of habeas corpus pursuant to 28 U.S.C. § 2241 ordering  
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Respondents to release Petitioner from civil immigration custody upon reasonable conditions of supervision;

4. Issue an order enjoining Respondents from removing or transferring Petitioner from the Southern District of California without prior notice to this Court and to Petitioner’s counsel, and from executing any order of removal pending adjudication of this petition;

5. Alternatively, issue an order directing Respondents to provide Petitioner within three (3) days a bond hearing before an Immigration Judge at which jurisdiction shall be deemed established and the government bears the burden of proving by clear and convincing evidence that Petitioner poses a danger or a flight risk sufficient to justify continued detention;

6. Alternatively, issue an order directing Respondents to permit Petitioner to withdraw her application for admission and depart voluntarily pursuant to INA § 235(a)(4) and 8 C.F.R. § 235.4, in lieu of issuance or execution of any expedited removal order;

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2 7. Award Petitioner her reasonable attorneys' fees and costs pursuant to  
3 the Equal Access to Justice Act, 28 U.S.C. § 2412; and

4  
5 8. Grant such other and further relief as this Court deems just and proper.

6  
7  
8 Respectfully submitted,

9 Dated April 24, 2026.

10  
11 */s/ [Steven K. Ridgill]*

12 

---

Steven Ridgill, SBN 338535  
13 LAW OFFICE OF JUDITH L. WOOD  
201 South Santa Fe Ave., Suite 101  
14 Los Angeles, CA 90012  
(213) 680-7801  
15 steven@judy-wood.com  
16 *Attorney for Petitioner*

**EXHIBITS**

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1. Letter requesting Voluntary Departure, dated 04/23/2026
2. ICE Detainee Locator page, Petitioner's information

**VERIFICATION**

1  
2 This petition cannot be immediately verified by AMANDA DA SILVA  
3 because she is in Respondents' custody. Consequently, the undersigned counsel for  
4 Petitioner hereby verifies that the information in this petition is true and correct to  
5 the best of my knowledge and belief based on information provided directly by the  
6 Petitioner and Petitioner's fiancé.  
7

8  
9 SWORN under penalty of perjury this date of April 24, 2026, at Placentia,  
10 California.

11  
12 /s/ [Steven K. Ridgill]

13 Steven K. Ridgill, attorney for  
14 Petitioner, Amanda Da Silva  
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**CERTIFICATE OF WORD COUNT**

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The undersigned, counsel of record for Petitioner, certifies that the preceding  
Petition for Writ of Habeas Corpus contains 3,326 words.

Certified this date of April 24, 2026, at Placentia, California.

/s/ [Steven K. Ridgill]

Steven K. Ridgill, attorney for  
Petitioner