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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
SAN DIEGO

Patricia CEDILLO CERVANTES,
Petitioner,

v.

Todd Blanche, Acting Attorney General of the United States, Department of Justice;

Markwayne Mullin, Secretary of Homeland Security;

Todd Lyons, Senior Official Performing the Duties of the Director of U.S. Immigration and Customs Enforcement;

Patrick Divver, Field Office Director of the San Diego Immigration and Customs Enforcement Office;

Jorge Velarde, Assistant Field Office Director of the Immigration and Customs Enforcement, Otay Mesa Detention Center;

Christopher J. LaRose; Senior Warden, Otay Mesa Detention Center;

Respondents.

Case No. '26CV4356 CAB MSB

Agency No. [redacted]

PETITION FOR WRIT OF HABEAS CORPUS BY A PERSON IN FEDERAL CUSTODY UNDER 28 U.S.C. § 2241 AND REQUEST FOR ORDER TO SHOW CAUSE WITHIN THREE DAYS

INTRODUCTION

1. Petitioner, Patricia Cedillo Cervantes (A[redacted] (hereinafter "Patricia" or "Petitioner"), a 50-year-old Mexican national who has been detained at the Otay Mesa Detention Center in San Diego, California for 184 days.

2. Petitioner is represented by counsel's office in her immigration matters. Petitioner is in ongoing removal proceedings which began in 2009.

3. This is Petitioner's second habeas corpus petition (*see* Case No. 3:26-cv-01446-RSH-MSB). On March 30, 2026, the Honorable District Judge Robert S. Huie denied her habeas corpus petition, finding in relevant part that "Petitioner [did] not [meet] her burden of establishing that '[sh]e is in custody in violation of the Constitution or laws or treaties of the United States.' 28 U.S.C. § 2241(c)(3)." Her prior habeas corpus petition requested immediate release, alleging Constitutional and Administrative Procedure Act ("APA") violations, found by the Court to be insufficient on their face.

4. In this second petition, Petitioner's claims are entirely separate from the claims of her first petition, in that she asks this Court to find that her continued detention is unlawful without access to a Constitutionally adequate bond hearing and requests an order that she may not be transferred during the pendency of this petition.

JURISDICTION

5. This action arises under the Constitution of the United States and the Immigration

and Nationality Act (INA), 8 U.S.C. § 1101 *et seq.*

6. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States Constitution (Suspension Clause).

7. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 *et. seq.*, the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.

8. The provisions in 8 U.S.C. §§ 1252(g) and 1252(b)(9) do not strip this Court of jurisdiction. Petitioner is not contesting the commencement or adjudication of removal proceedings against her, nor is she raising an issue with respect to the execution of removal. Petitioner does challenge her prolonged detention. The petition is independent of the removal proceedings and all questions related to the commencement of removal proceedings or any part of the removal process. "[C]laims that are independent of or collateral to the removal process do not fall within the scope of § 1252(b)(9)." *J.E.F.M. v. Lynch*, 837 F.3d 1026, 1032 (9th Cir. 2016). Additionally, Section 1252(g) "does not prohibit challenges to unlawful practices merely because they are in some fashion connected to removal orders." *Ibarra-Perez v. United States*, 154 F.4th 989, 997 (9th Cir. 2025). Thus, this Court is not stripped of jurisdiction by Sections 1252(g) and 1252(b)(9).

VENUE

9. Venue is proper because Patricia is detained at the Otay Mesa Detention Center in San Diego, California, which is within the jurisdiction of this District. Further, a substantial part of the events or omissions giving rise to her claims occurred in this District and no real property is involved in this action. 28 U.S.C. § 1391(e). Notably, Patricia's residence with her U.S. citizen husband is in the County of San Diego, California.

REQUIREMENTS OF 28 U.S.C. § 2243

10. The Court must grant the petition for writ of habeas corpus or issue an order to show cause (OSC) to the respondents "forthwith," unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, the Court must require respondents to file a return "within *three days* unless for good cause additional time, not exceeding twenty days, is allowed." *Id.* (emphasis added).

11. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ has been referred to as "perhaps the most important writ known to the constitutional law of England, affording as it does a *swift* and imperative remedy in all cases of illegal restraint or confinement." *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added).

PARTIES

Petitioner

12. Petitioner is a Mexican national who is in custody at the Otay Mesa Detention Center located at 7488 Calzada De La Fuente, San Diego, CA 92154. When at

liberty, she resides with her U.S. citizen husband in Vista, California. She is in the custody, and under the direct control, of Respondents and their agents.

Respondents

13. Respondent Todd Blanche is sued in his official capacity as the Acting Attorney General of the United States and the senior official of the U.S. Department of Justice ("DOJ"). In that capacity, she has the authority to adjudicate removal cases and to oversee the Executive Office for Immigration Review ("EOIR"), which administers the immigration courts and the Board of Immigration Appeals. Respondent Blanche is a legal custodian of Petitioner.

14. Respondent Markwayne Mullin is sued in his official capacity as the Secretary of the DHS. In this capacity, Respondent Secretary is responsible for the implementation and enforcement of the Immigration and Nationality Act, and oversees U.S. Immigration and Customs Enforcement ("ICE"), the component agency responsible for Petitioner's detention and custody. Respondent Secretary is a legal custodian of Petitioner.

15. Respondent Todd Lyons, is sued in his official capacity as the Senior Official Performing the Duties of the Director ICE. Respondent Lyons is the legal custodian of Petitioner.

16. On information and belief, Respondent Patrick Divver is sued in his official capacity as the Field Office Director of the San Diego ICE Office. Respondent Divver is a legal custodian of Petitioner and has authority to release her.

17. On information and belief, Respondent Jorge Velarde is the current Assistant Field Office Director responsible for the San Diego Field Office of ICE with administrative jurisdiction over Petitioner's immigration case. He is a legal custodian of Petitioner and is named in his official capacity.

18. Respondent Christopher J. LaRose is sued in his official capacity as the Senior Warden, Otay Mesa Detention Center. Respondent LaRose is the direct physical custodian of Petitioner and has direct authority to release her.

STATEMENT OF FACTS

19. The following facts were ascertained by Counsel's review of Petitioner's immigration records and documents related to Counsel's office's representation of Petitioner in removal proceedings.

20. Petitioner, Patricia, is a 50-year-old native of Mexico who has resided in the United States since the age of 16, following her entry in March 1991 without inspection and admission. She has multiple entries to the United States, with her last entry on or about August 10, 2004, at or near San Ysidro, without inspection or admission. Ex. A, Notice to Appear Documents.

21. Patricia's father is a U.S. citizen who has filed a family-based petition for Patricia, however she was unable to receive the benefit of that petition without spending ten years outside of the United States and filing a waiver of her inadmissibility to return. *See* 8 U.S.C. 1182(a)(9)(C).

22. In 2009, ICE issued to her a noncompliant[1] Notice to Appear ("NTA"), charging her as being inadmissible pursuant to 8 USC § 1182(a)(6)(A)(i) [INA § 212(a)(6)(A)(i)] (present without inspection or admission)[2]. *See* Ex. A. On April 14, 2009, ICE released her on her own recognizance on. *See* Ex. B, 2009 Custody Documents. Those proceedings were later administratively closed and only re-calendared following DHS's request in 2025, following Petitioner's arrest on new charges.

23. Petitioner has a criminal record, including: a guilty plea on April 13, 2009 to a violation of California Vehicle Code ("VC") § 23152(b) (driving under the influence with a blood alcohol level above .08%); a guilty plea on February 8, 2010, to possession of a forged instrument in the second degree under Oregon statute 165.017, a misdemeanor; and a guilty plea on September 9, 2025, to a violation of VC § 23153(A) (DUI causing injury) with the enhancements of VC sections 23578 (excessive blood alcohol) and 23558 (bodily injury to the victim(s). While she has complied with all orders of the criminal court for her

[1] *See Pereira v. Sessions*, 138 S.Ct. 2105 (2018) (an NTA without a date and time for the hearing does not trigger the stop-time rule); *Niz-Chavez v. Garland*, 141 S. Ct. 1474 (2021)

[2] While the NTA listed her as an "arriving alien", the document was amended and the facts in the record evidence her last entry was without inspection or admission. *See* Ex. A.

earlier convictions, she has yet to meet all requirements for her most recent conviction because she has been in immigration detention since January 2026.

24. In removal proceedings, Patricia filed an application to cancel her removal under 8 USC § 1229b(b)(1) [INA § 240A(b)], based upon the exceptional and extremely unusual hardship her removal would cause to her U.S. citizen spouse and U.S. citizen father. As presented in her case before the immigration court, Petitioner's husband suffers major depressive disorder, that, along with the emotional and financial hardship both he and Respondent's U.S. citizen father will suffer cumulatively, will amount to exceptional and extremely unusual hardship should Petitioner's application be denied.

25. She had master calendar hearings while detained on February 23 and March 26. On March 26, the court set a filing deadline for June 17, and individual hearing for July 1. Petitioner complied with the filing deadline, filing 226 pages of evidence, including a psychological evaluation for her husband, and financial evidence for her husband and father. She presented testimonial evidence on July 1 at her hearing. Some specific criminal documents had not yet been received by that date, so her individual hearing on July 1 was continued to July 14 for the evidence, additional witness testimony, as well as to allow for cross-examination. She had an additional individual hearing on July 23, where all evidence and

testimony was completed. Her removal proceedings are scheduled for an oral decision to be given on August 4, 2026, at 3:00 p.m.

LEGAL FRAMEWORK

26. The Constitution establishes due process rights for "all 'persons' within the United States, including [noncitizens], whether their presence here is lawful, unlawful, temporary, or permanent." *Hernandez v. Sessions*, 872 F.3d 976, 990 (9th Cir. 2017) (quoting *Zadvydas* 533 U.S. at 693). These rights include procedural due process rights.

27. "It is well established that the Fifth Amendment entitles [noncitizens] to due process of law in deportation proceedings." *Demore v. Kim*, 538 U.S. 510, 523 (2003) (quoting *Reno v. Flores*, 507 U.S. 292, 306 (1993)). "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that [the Due Process] Clause protects." *Zadvydas v. Davis*, 533 U.S. at 690.

28. The INA provides for mandatory detention of noncitizens subjected to an expedited removal order imposed pursuant to 8 U.S.C. § 1225(b)(1) and for certain other noncitizen applicants for admission to the U.S. who are deemed not clearly entitled to be admitted. *See* 8 U.S.C. § 1225(b)(2). Petitioner is detained pursuant to 8 U.S.C. § 1226(a), despite Respondents' assertion she is detained pursuant to § 1225(b)(2). Nevertheless, substantive due process prohibits civil detention that is

punitive in purpose or in effect, including civil detention that is excessively prolonged in relation to its purpose. *See Jackson v. Indiana*, 406 U.S. 715, 738 (1972). Put otherwise, "due process requires that the nature and duration of commitment bear some reasonable relation to the purpose for which the individual is committed"; otherwise, their commitment amounts to punishment. *Jones v. Blanas*, 393 F.3d 918, 931 (9th Cir. 2004) (quoting *Jackson*, 406 U.S. at 738).

29. Even when the Constitution permits confinement that is brief, the Supreme Court has recognized that such confinement becomes punitive when it is "excessively prolonged." *United States v. Salerno*, 481 U.S. 739, 474 n.4 (1987). Moreover, as a detained person's time in custody increases, so too does their liberty interest. *See Zadvydas*, 533 U.S. at 691. "[F]or detention to remain reasonable," greater justification is needed "as the period of confinement grows." *Id.*

30. Accordingly, "at some point, regardless of the risks, due process will require that [a person subject to prolonged civil confinement] be released." *United States. v. Torres*, 995 F.3d 695, 709–10 (9th Cir. 2021) (noting that federal government had conceded this point); see also *United States v. Briggs*, 697 F.3d 98, 103 (2d Cir. 2012) (stating that "for every set of circumstances, due process does impose some limit" on civil confinement).

31. "There has been a dearth of guidance regarding the point at which an immigration detainee's continued mandatory detention becomes unconstitutional," and thus

challenges to prolonged immigration detention remain. *Abduraimov v. Andrews*, 2025 U.S. Dist. LEXIS, *9 (E.D. Cal. Oct. 14, 2025) (citing *Rodriguez Diaz v. Garland*, 53 F.4th 1189, 1203 (9th Cir. 2002)). The Ninth Circuit has expressed "grave doubts that any statute that allows for arbitrary prolonged detention without any due process is constitutional..." *Rodriguez v. Marin*, 909 F.3d 252, 255 (9th Cir. 2018).

32. While Petitioner is detained under § 1226 of the Act, even noncitizens detained under § 1225(b) for a prolonged period without an individualized bond hearing may assert a constitutional right to due process. *See Sadeqi v. LaRose*, No. 25-CV-2587-RSH-BJW, 2025 WL 3154520, at *2 (S.D. Cal. Nov. 12, 2025) ("This Court agrees with the majority position that a petitioner detained under Section 1225(b)(1) may assert a due process challenge to prolonged mandatory detention without a bond hearing."); *Maksin v. Warden, Golden State Annex*, No. 1:25-CV-00955-SKO (HC), 2025 WL 2879328, at *3 (E.D. Cal. Oct. 9, 2025) ("Several courts including the Third, Sixth, and Ninth Circuit, as well as numerous district courts, have found that unreasonably long detention periods may violate the due process clause." (collecting cases)); *Abdul-Samed v. Warden of Golden State Annex Det. Facility*, No. 1:25-CV-00098-SAB-HC, 2025 WL 2099343, at *6 (E.D. Cal. July 25, 2025) ("[E]ssentially all district courts that have considered the issue agree that prolonged mandatory detention pending removal proceedings, without a

bond hearing, 'will—at some point—violate the right to due process.'" (quoting *Martinez v. Clark*, No. C18-1669-RAJ-MAT, 2019 WL 5968089, at *6 (W.D. Wash. May 23, 2019), *report and recommendation adopted*, No. 18-CV-01669-RAJ, 2019 WL 5962685 (W.D. Wash. Nov. 13, 2019))); *Kydyrali v. Wolf*, 499 F. Supp. 3d 768, 772 (S.D. Cal. 2020) ("[T]he Court joins the majority of courts across the country in concluding that an unreasonably prolonged detention under 8 U.S.C. § 1225(b) without an individualized bond hearing violates due process."); *Banda v. McAleenan,* 385 F. Supp. 3d 1099, 1116-17 (W.D. Wash. 2019).

33. The procedural component of the Due Process Clause prohibits the government from imposing even permissible physical restraints without adequate procedural safeguards. The Ninth Circuit has "regularly applied *Mathews* to due process challenges to removal proceedings." *Rodriguez Diaz*, 53 F.4th at 1193 (citing *Mathews v. Eldridge*, 424 U.S. 319 (1976)). Under the *Mathews* test, this Court must weigh: (1) the private interested affected; (2) the risk of erroneous deprivation and probable value of procedural safeguards; and (3) the government's interest. 424 U.S. at 335. This Court has also applied a six-factor balancing test used by some district courts. *See Kydyrali v. Wolf*, 499 F. Supp. 3d 768, 773-74 (S.D. Cal. 2020); *Banda v. McAleenan*, 385 F. Supp. 3d 1099, 1106 (W.D. Wash. 2019). That test considers: (1) the total length of detention to date; (2) the likely

duration of future detention; (3) conditions of detention; (4) delays in the removal proceedings caused by the detainee; (5) delays in the removal proceedings caused by the government; and (6) the likelihood that the removal proceedings will result in a final order of removal. *See Kydyrali*, 499 F. Supp. 3d at 773-74. Of these, the length of detention is the most important factor. *Id.* at 774.

CLAIMS FOR RELIEF

FIRST CLAIM FOR RELIEF
Violation of Fifth Amendment – Substantive Due Process

34. Petitioner incorporates by reference the factual allegations set forth in the preceding paragraphs.

35. The Due Process Clause of the Fifth Amendment forbids the government from depriving any "person" of liberty "without due process of law." U.S. Const. amend. V.

36. Due process prohibits the government from punishing people through civil detention. Civil detention becomes punitive when its duration or nature is unreasonable relative to the purpose for which the individual is detained—in this case, effectuating removal and safeguarding the community.

37. Petitioner's prolonged detention for over 184 days without a bond hearing violates due process. Moreover, Petitioner has not caused delays in her removal proceedings. She attended all court hearings, timely filed evidence by the filing deadline, and is presently awaiting a decision from the immigration judge,

scheduled to be provided orally on August 4, 2026, at 3:00 pm. Moreover, she has presented evidence that her U.S. citizen husband and father will suffer exceptional and extremely unusual hardship without her. Thus, the six factors implored by this Court weigh in favor of Petitioner.

SECOND CLAIM FOR RELIEF
Violation of Fifth Amendment – Procedural Due Process

38. Petitioner incorporates by reference the factual allegations set forth in the preceding paragraphs.

39. Petitioner has a fundamental private interest to be free from detention. *See Abduraimov*, U.S. Dist. LEXIS 202711, at *17 (citing *Zadvydas*, 533 U.S. at 690)); *see also Hernandez*, 872 F.3d at 993 (quoting *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992)) and *Rodriguez Diaz*, 53 F.4th at 1207 (quoting *Singh v. Holder*, 638 F.3d 1196, 1208 (9th Cir. 2011)).

40. Because Petitioner has received no procedural protections and the statute under which DHS alleges she is detained denies her procedural protections, the risk of erroneous deprivation of her liberty interest is high. *See Abduraimov*, 2025 U.S. Dist. LEXIS 202711, at *19; *see also Garcia v. Mattos*, 2026 U.S. Dist. LEXIS 6874, at *12 (D. Nev. Jan. 14, 2026) ("The risk of erroneous deprivation is extraordinarily high where ICE and DHS agency officials have sole, unguided, and unreviewable discretion to detain Petitioner without any individualized

showing of why his detention is warranted, nor any process for Petitioner to challenge the exercise of that discretion.").

41. Finally, the government has no legitimate interest in Petitioner's prolonged detention without a bond hearing. Courts in this district have found that "detention over seven months without a bond hearing weighs toward a finding that it is unreasonable." *Amado v. United States Dep't of Just.,* No. 25CV2687-LL(DDL), 2025 WL 3079052, at *5 (S.D. Cal. Nov. 4, 2025).

42. For these reasons, Petitioner's prolonged detention violates the Due Process Clause of the Fifth Amendment and she should be immediately released or be provided with a bond hearing within 7 days where the government has the burden to show by clear and convincing evidence that Petitioner presents a risk of flight or danger to the community.

THIRD CLAIM FOR RELIEF
Detention under INA § 1226

43. Petitioner incorporates by reference the factual allegations set forth in the preceding paragraphs.

44. In an alternative claim for relief, Petitioner is entitled to consideration for release because her lawful right to a bond under 8 U.S.C. § 1226(a) has been violated. *See* Ex. A, Warrant for Arrest of Alien (Patricia is "within the country in violation of the immigration laws and is therefore liable to being taken into custody as authorized by section 236 of the Immigration and Nationality Act."); *see also* Ex.

B, 2009 Custody Documents. The immigration courts have been instructed to follow the decision in *Matter of Yajure Hurtado*, an administrative decision that goes against longstanding law defining who is eligible for a bond hearing. *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025) (holding a person who enters the United States without inspection is subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A)). On this basis, Petitioner has been denied the opportunity to seek a bond hearing by an immigration judge and suffered injustice as a result.

45. Petitioner was not "seeking admission" at the time of her entry to the United States, so her detention is governed by section 1226(a). *See, e.g.*, *Arias Torres v. Bondi*, No. 25-cv-2457-BAS-MSB, 2025 WL 3214773 (S.D. Cal. Nov. 18, 2025); *Martinez Lopez v. LaRose*, No. 25-cv-2717-JES-AHG, 2025 WL 3030457 (S.D. Cal. Oct. 302025); *Beltran v. Noem*, No. 25cv2650-LL-DEB, 2025 WL 3078837 (S.D. Cal. Nov. 4, 2025); *Garcia v. Noem*, 803 F. Supp. 3d 1064 (S.D. Cal. 2025); *Esquivel-Ipina v. LaRose*, No. 25-CV-2672 JLS (BLM), 2025 WL 2998361 (S.D. Cal. Oct. 24, 2025); *Lucas-Miguel v. LaRose*, No. 25-cv-3022-RSH-JLB, 2025 WL 3251580 (S.D. Cal. Nov. 21, 2025); *Vasquez-Diaz v. LaRose*, No. 25-cv-3038-TWR-JLB, ECF No. 6 (S.D. Cal. Nov. 13, 2025); *Cardoso v. LaRose*, No. 25-cv-3043-BJC-VET, ECF No. 7 (S.D. Cal. Dec. 12, 2025); *Maceda-Garcia v. Noem*, No. 25-cv-2968-JO-JLB, ECF No. 9 (S.D. Cal. Nov. 13, 2025); *A.S. v. LaRose*, No. 25-cv-2876-RBM-VET, ECF No. 9 (S.D. Cal. Nov. 19, 225); *Prieto-*

Cordova v. LaRose, No. 25-cv-2824-CAB-DDL, 2025 WL 3228953 (S.D. Cal. Nov. 19, 2025); *Lagarda-Vega v. Noem*, No. 25-cv-2970-GPC-DDL, 2025 WL 3558931 (S.D. Cal. Dec. 11, 2025); *Nayyer v. LaRose*, No. 25-cv-3111-AGS-DDL, ECF No. 7 (S.D. Cal. Dec. 12, 2025); *Amaya v. Noem*, No. 25cv2892-BTM-DEB, 2025 WL 3182998 (S.D. Cal. Nov. 13, 2025).

46. By denying Petitioner a bond hearing under § 1226(a) and asserting that she is subject to mandatory detention under § 1225(b)(2), Respondents violate Petitioner's statutory rights under the INA. Given the length for which Petitioner has been detained (184 days and counting), should this violation not amount to immediate release, she is deserving of a bond hearing where the burden has shifted so that now DHS must prove by clear and convincing evidence that Petitioner is a danger or flight risk. *Singh v. Holder*, 638 F.3d 1196 (9th Cir. 2011). *See Rodriguez Diaz v. Garland*, 53 F.4th 1189, 1202 n.4 (expressly declining to abrogate *Singh*); *Rodriguez Diaz v. Garland*, 83 F.4th 1177, 1179 (9th Cir. 2023) (Paez, J., dissenting from denial of rehearing *en banc*) ("Singh's constitutional holding ... remains binding law of our court."). *See also Aleman Gonzalez v. Barr*, 955 F.3d 762, 781 (9th Cir. 2020), rev'd on other grounds, 142 S. Ct. 2057 (2022) (holding that *Singh*'s burden-of-proof rule was a constitutional due process holding that survives the Supreme Court's statutory interpretation holding in *Jennings v. Rodriguez*, 583 U.S. 281 (2018)).

PRAYER FOR RELIEF

a) Assume jurisdiction over this matter;

b) Order that Petitioner shall not be transferred outside of the Southern District of California while this petition is pending;

c) Declare that Petitioner's ongoing prolonged detention is unlawful and violates the Due Process Clause of the Fifth Amendment;

d) Issue a Writ of Habeas Corpus ordering Respondents to immediately release Petitioner from prolonged custody wherein she was unlawfully denied a bond hearing, or in the alternative, order Respondents to provide her a bond hearing within 7 days where the government must prove by clear and convincing evidence that Petitioner is a flight risk or danger to the community;

e) Issue an Order to Show Cause ordering Respondents to show cause within three days why this Petition should not be granted;

f) Award Petitioner attorney's fees and costs under the Equal Access to Justice Act ("EAJA"), as amended, 28 U.S.C. § 2412, and on any other basis justified under law; and

g) Grant any other and further relief that this Court deems just and proper.

Respectfully submitted,

Dated: July 29, 2026

/s/ Leah L. Chavarria
Leah L. Chavarria
Counsel for Petitioner

LIST OF EXHIBITS

EXHIBIT A: Notice to Appear and Warrant

EXHIBIT B: 2009 RELEASE DOCUMENTS

VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I represent Petitioner, Patricia Cedillo Cervantes, and submit this verification on her behalf. I hereby verify under penalty of perjury under the laws of the United States and the State of California that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated this 29th day of July, 2026.

/s/ *Leah L. Chavarria*
Leah L. Chavarria
Counsel for Petitioner