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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

JAVIER MEDINA ESCOBAR, aka JUAN MANUEL RAGGIO-ESCOBAR, Petitioner, v. TODD BLANCHE, Acting Attorney General of the United States, in his official capacity; MARKWAYNE MULLIN, Secretary of the U.S. Department of Homeland Security, in his official capacity; DAVID J. VENTURELLA, Acting Director of U.S. Immigration and Customs Enforcement, in his official capacity; PATRICK DIVVER, ICE Field Office Director for San Diego County, in his official capacity, WARDEN OF OTAY MESA DETENTION CENTER. Respondents.	Case No. '26CV4452 AGS SBC PETITION FOR WRIT OF HABEAS CORPUS AND COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

INTRODUCTION

1. Petitioner Javier Medina Escobar has resided in the United States since approximately 2008 and has established deep family, employment, and community ties in Southern California. On October 7, 2025, after posting bond in a federal criminal case, officers of the Department of Homeland Security took Petitioner into immigration custody, purportedly reinstated a prior removal order, and transferred him to the Otay Mesa Detention Center, where he has remained continuously detained.

2. Petitioner immediately expressed a fear of persecution or torture if returned to Mexico. Following reasonable-fear proceedings, an Immigration Judge affirmed a negative reasonable-fear determination. Petitioner timely filed a Petition for Review in the United States Court of Appeals for the Ninth Circuit. The Ninth Circuit entered a stay of removal, which remains in effect.

3. The pending Petition for Review seeks judicial review of the purported reinstatement order itself and challenges the reasonable-fear proceedings through which Respondents contend they acquired authority to execute that purported reinstatement order. Among those challenges is the Immigration Judge's ruling that Petitioner's retained counsel could not speak, participate, or object during the hearing and could only consult with Petitioner beforehand.

4. Proceedings before the Ninth Circuit are presently stayed pending issuance of the mandate in Navarrete v. Blanche, No. 24-2776. At least one member of the court has sua sponte requested consideration of rehearing en banc in Navarrete, and briefing on that question remains ongoing. No merits briefing has

occurred in Petitioner's Petition for Review, and no reasonably foreseeable date presently exists on which Respondents may lawfully execute Petitioner's removal.

5. Petitioner has remained continuously detained since October 7, 2025. As his detention has continued, the circumstances justifying civil immigration detention have materially changed. Removal remains judicially stayed, judicial review of the legality of the purported reinstatement order and the proceedings through which Respondents claim authority to execute that order remains unresolved, and no identified date presently exists on which Respondents may lawfully effect Petitioner's removal.

6. Petitioner sought custody redetermination before the Immigration Court under 8 C.F.R. § 1236. The Immigration Judge concluded that she lacked jurisdiction to redetermine Petitioner's custody and denied relief. Since that ruling, the Ninth Circuit has rejected the statutory interpretation adopted in *Matter of Yajure Hurtado*, holding that noncitizens present without admission who are apprehended in the interior of the United States are detained under 8 U.S.C. § 1226 rather than § 1225(b)(2)(A). *Rodriguez Vazquez v. Bostock*, No. 25-6842, slip op. at 2–5, 15, 20–21 (9th Cir. July 30, 2026)..

7. This petition presents two related claims. First, Petitioner's prolonged civil detention violates the Due Process Clause of the Fifth Amendment because it no longer bears a reasonable relationship to its regulatory purpose and has no reasonably foreseeable endpoint tied to executable removal. Second, Respondents lack statutory authority to continue Petitioner's detention under the Immigration and Nationality Act while judicial review remains pending and removal is stayed. Alternatively, if Respondents properly invoked 8 U.S.C. § 1231 upon taking

Petitioner into custody, the ninety-day period of mandatory detention has long since expired.

8. Petitioner therefore seeks a writ of habeas corpus together with appropriate declaratory and injunctive relief requiring his immediate release or such other relief as the Court determines is authorized by law.

JURISDICTION AND VENUE

9. This Court has jurisdiction under 28 U.S.C. §§ 2241 and 1331. The Suspension Clause preserves the availability of habeas corpus to challenge unlawful civil immigration detention. U.S. Const. art. I, § 9, cl. 2.

10. Venue is proper in the Southern District of California under 28 U.S.C. § 1391(e)(1)–(2). Petitioner was arrested in this District, Petitioner's immigration custody proceedings occurred in this District, and the ICE Field Office Director responsible for Petitioner's custody resides in this District.

11. The Court has authority to grant declaratory and injunctive relief under 28 U.S.C. §§ 2201–2202 and its equitable powers to the extent necessary to effectuate habeas relief.

PARTIES

12. Petitioner Javier Medina Escobar, also known as Juan Manuel Roggio, is a native and citizen of Mexico who has resided continuously in the United States since 2008. He was arrested in this District in October 2025, and remains detained in ICE custody at Otay Mesa the Detention Center.

13. Respondent Todd Blanche is the acting Attorney General of the United States and is sued in her official capacity as the head of the Department of Justice, which administers the Executive Office for Immigration Review.

14. Respondent Markwayne Mullin is the Secretary of the U.S. Department of Homeland Security and is sued in his official capacity as the Cabinet official charged with the administration and enforcement of the immigration laws, including custody and release authority. See 8 U.S.C. § 1103(a).

15. Respondent David J. Venturella is the Senior Official Performing the Duties of the Director of U.S. Immigration and Customs Enforcement (ICE) and is sued in his official capacity. He is responsible for the administration and oversight of ICE, including the detention of noncitizens in ICE custody.

16. Respondent Patrick Divver is the Immigration and Customs Enforcement (ICE) Field Office Director for San Diego County, including Otay Mesa Detention Center, and is sued in his official capacity. As Field Office Director, he exercises legal custody and control over Petitioner's detention and is responsible for making custody, transfer, or release determinations.

17. The Warden of Otay Mesa Detention Center is sued in his official capacity as Petitioner's immediate physical custodian. The Warden is responsible for Petitioner's day-to-day physical custody and is named as a Respondent pursuant to the immediate custodian rule established in *Rumsfeld v. Padilla*, 542 U.S. 426 (2004).

LEGAL FRAMEWORK

A. STATUTORY DETENTION FRAMEWORK

18. The Immigration and Nationality Act ("INA") establishes distinct statutory detention regimes that apply at different stages of the removal process.

19. 8 U.S.C. § 1226(a) (INA § 236(a)), authorizes discretionary civil detention pending a decision on whether an individual is to be removed from the

United States and expressly permits release on bond or conditional parole. The implementing regulations authorize immigration judges to conduct custody redetermination hearings under that provision. See 8 C.F.R. §§ 1003.19(a), 1236.1(d).

20. 8 U.S.C. § 1231(a) (INA § 241(a)), establishes the statutory framework governing detention after the removal period has commenced. The statute expressly defines when the removal period begins. See 8 U.S.C. § 1231(a)(1)(B). During the removal period, detention is mandatory. 8 U.S.C. § 1231(a)(2).

21. The statutory detention framework under Section 241 of the INA, 8 U.S.C. § 1231, therefore depends upon whether the removal period has commenced. Where the removal period has not yet begun, the detention provisions of Section 241 have not yet become operative.

22. 8 U.S.C. § 1225(b) (INA § 235(b)), governs the detention of certain noncitizens seeking admission and certain noncitizens apprehended at the time of entry into the United States..

B. SECTION 241(a)(1)(B) GOVERNS WHEN THE REMOVAL PERIOD BEGINSS

23. A prior order of removal may be reinstated if the Department of Homeland Security determines that a noncitizen has unlawfully reentered the United States after removal or voluntary departure under that order. 8 U.S.C. § 1231(a)(5).

24. In ordinary withholding-only proceedings following reinstatement, the Supreme Court has held that detention generally is governed by Section 241.

Johnson v. Guzman Chavez, 594 U.S. 523, 526 (2021); *Padilla-Ramirez v. Bible*, 882 F.3d 826, 830–32 (9th Cir. 2017).

25. Section 241 separately defines when the removal period begins. Where the removal order is judicially reviewed and if a court orders a stay of the removal of the alien, the removal period begins on the date of the court's final order. 8 U.S.C. § 1231(a)(1)(B)(ii).

26. The Ninth Circuit has held, however, that Section 241 does not provide detention authority before the removal period has commenced. Accordingly, where a court of appeals reviews a removal order and enters a stay of removal, the removal period has not begun, and Section 241 provides no present detention authority. During that interval, detention is governed by Section 236(a). *Prieto-Romero v. Clark*, 534 F.3d 1053, 1060–65 (9th Cir. 2008).

27. *Guzman Chavez* and *Padilla-Ramirez* addressed the detention statute applicable during ordinary withholding-only proceedings following reinstatement. *Prieto-Romero* addressed a different question: the effect of judicial review of a removal order accompanied by a judicial stay under 8 U.S.C. § 1231(a)(1)(B)(ii).

28. Because those authorities address different statutory provisions and different procedural postures, they are not inconsistent. Whether Section 241 presently authorizes detention depends upon whether the removal period has commenced under Section 241(a)(1)(B).

C. MANDATORY DETENTION UNDER SECTION 241(a)(2) IS LIMITED TO THE REMOVAL PERIOD

29. Section 241(a)(2) provides that mandatory detention applies during the removal period. 8 U.S.C. § 1231(a)(2).

30. Section 241(a)(3) provides that, if a noncitizen does not leave or is not removed within the removal period, the noncitizen, pending removal, is subject to supervision under regulations prescribed by the Attorney General. The statute requires that those regulations include provisions for the noncitizen to appear periodically before an immigration officer for identification, submit to medical or psychiatric examinations if necessary, provide information under oath, and comply with reasonable written restrictions on conduct or activities. 8 U.S.C. § 1231(a)(3).

31. Section 241 thus distinguishes between the removal period, during which Section 241(a)(2) governs mandatory detention, and the period following the removal period, during which Section 241(a)(3) provides for supervision pending removal.

D. CUSTODY DETERMINATIONS UNDER 8 U.S.C. § 1226(a) MUST BE INDIVIDUALIZED

32. Where detention is governed by 8 U.S.C. § 1226(a), the statute authorizes continued detention or release on bond or conditional parole pending a final decision on whether the noncitizen is to be removed, including during judicial review where a stay of removal prevents commencement of the removal period under 8 U.S.C. § 1231(a)(1)(B)(ii). Prieto-Romero v. Clark, 534 F.3d 1053, 1062–65 (9th Cir. 2008).

33. Custody determinations under 8 U.S.C. § 1226(a) are individualized and are based upon current dangerousness to the community, risk of flight, and whether conditions of release, including bond or other less restrictive alternatives, would reasonably mitigate any identified risk. Prieto-Romero v. Clark, 534 F.3d 1053, 1062–63 (9th Cir. 2008); Singh v. Holder, 638 F.3d 1196, 1203–05 (9th Cir. 2011).

FACTUAL AND PROCEDURAL BACKGROUND

34. Petitioner Javier Medina Escobar is a native and citizen of Mexico. Following his 2004 federal conviction, Petitioner was removed to Mexico on January 28, 2008. Petitioner thereafter returned to the United States without inspection and has since resided continuously in Southern California, where he established his home, raised his family, and operated a window installation and maintenance business that supported his family and employed numerous individuals in the community. The Department of Homeland Security alleges that Petitioner reentered the United States on or about March 1, 2010.

35. Petitioner is married and has deep family and community ties in Southern California. Before his detention, he served as the primary financial provider for his household, actively participated in his children's lives, and maintained a longstanding reputation as a hardworking businessman, employer, mentor, and community member. Numerous family members, employees, customers, and community members have submitted letters describing Petitioner's integrity, generosity, and positive contributions over many years.

36. Petitioner's criminal history consists principally of a 2004 federal conviction arising from conduct that occurred more than twenty years ago. According to the contemporaneous immigration investigative report, Petitioner's admitted involvement was delivering groceries and food to undocumented individuals. Since returning to the United States, Petitioner has operated his business, supported his family, and has not sustained any additional criminal convictions.

37. In September 2025, Petitioner was charged in the United States

District Court for the Southern District of California with being a deported alien found in the United States. After posting bond in the criminal case, Immigration and Customs Enforcement ("ICE") assumed custody of Petitioner and purportedly reinstated a prior order of removal. The federal criminal charges were subsequently dismissed, and Petitioner has remained continuously in ICE custody since October 7, 2025.

38. After being taken into ICE custody, Petitioner expressed a fear of persecution and torture if returned to Mexico. The Department of Homeland Security referred Petitioner for reasonable-fear proceedings. On November 11, 2025, an Immigration Judge affirmed the negative reasonable-fear determination and returned the matter to DHS. No administrative appeal was available from that determination.

39. Petitioner timely sought judicial review in the United States Court of Appeals for the Ninth Circuit. The petition for review challenges the purported reinstatement order, the Immigration Judge's affirmance of the negative reasonable-fear determination, and the Immigration Judge's refusal to permit retained counsel to speak, participate, or object during the reasonable-fear proceedings. The petition for review remains pending.

40. The Ninth Circuit entered a stay of Petitioner's removal, which remains in effect. Accordingly, Respondents are presently prohibited from executing Petitioner's removal while the stay remains operative. On June 24, 2026, the Ninth Circuit stayed further proceedings in the petition for review pending issuance of the mandate in Navarrete v. Blanche, No. 24-2776, or further order of the court.

41. While judicial review remained pending, Petitioner sought custody redetermination before an Immigration Judge pursuant to 8 U.S.C. § 1226(a). On December 31, 2025, the Immigration Judge concluded that she lacked jurisdiction, stating: "No jurisdiction due to Hurtado and presence of a final order of removal."

42. The Immigration Judge alternatively stated only: "R is a danger due to criminal record. Therefore, no bond." The order contains no individualized findings regarding Petitioner's present dangerousness or current risk of flight, no consideration of whether conditions of release could reasonably mitigate any identified risk, and no discussion of the absence of violent or recent criminal conduct. Petitioner has therefore remained continuously detained without receiving a meaningful individualized custody determination.

43. After the Immigration Judge's ruling, the Ninth Circuit held that noncitizens present without admission who are apprehended in the interior of the United States are detained under 8 U.S.C. § 1226 rather than § 1225(b)(2)(A), rejecting the statutory interpretation adopted in *Matter of Yajure Hurtado*. *Rodriguez Vazquez v. Bostock*, No. 25-6842, slip op. at 2–5, 15, 20–21 (9th Cir. July 30, 2026).

44. Petitioner has remained continuously detained at the Otay Mesa Detention Center since October 7, 2025. During that time, he has been unable to operate his business, provide financial support to his family, or resume his ordinary family and community responsibilities.

45. Upon release, Petitioner will immediately return to his family at his residence in Southern California, resume operating his window installation and maintenance business, and comply with every condition of release imposed by this

Court or by the Department of Homeland Security, including reporting requirements, electronic monitoring, bond, or any other reasonable conditions deemed appropriate.

CAUSES OF ACTION

FIRST CAUSE OF ACTION
PETITIONER'S PROLONGED CIVIL DETENTION VIOLATES THE FIFTH AMENDMENT

46. Petitioner realleges and incorporates by reference paragraphs 1 through 45 as though fully set forth herein.

47. Petitioner has remained in the custody of U.S. Immigration and Customs Enforcement since October 7, 2025.

48. Petitioner's removal cannot presently be executed because the United States Court of Appeals for the Ninth Circuit has entered a stay of removal in his petition for review, *Medina Escobar v. Blanche*, No. 25-7102.

49. That petition remains pending. Proceedings in No. 25-7102 are stayed pending issuance of the mandate in *Navarrete v. Bondi*, No. 24-2776, or further order of the Ninth Circuit. The most recent docket activity occurred on July 17, 2026, when amici filed materials concerning en banc proceedings. No merits briefing has occurred. The petition for review challenges both the purported reinstatement order and the reasonable-fear proceedings through which Respondents contend the order became executable.

50. As a result, Respondents cannot execute Petitioner's removal unless and until the Ninth Circuit modifies or dissolves its stay. Nor is there any identified date by which the *Navarrete* mandate will issue, merits briefing will occur, the

Ninth Circuit will resolve No. 25-7102, or the stay of removal will be lifted. Petitioner's detention therefore has no reasonably foreseeable endpoint tied to an executable removal.

51. The Due Process Clause protects against civil confinement that bears no reasonable relation to its asserted regulatory purpose. Freedom from physical restraint is a core liberty interest, and the Government's immigration-detention authority remains constrained by the requirements of due process. *Zadvydas v. Davis*, 533 U.S. 678, 690, 699–701 (2001).

52. Although the Government has a legitimate regulatory interest in ensuring Petitioner's appearance if removal becomes legally possible, that interest does not authorize prolonged civil detention without a meaningful justification demonstrating that continued confinement remains necessary while removal is judicially stayed and no reasonably foreseeable date exists on which Respondents may execute Petitioner's removal.

53. Petitioner does not ask this Court to decide the merits of his pending petition for review or to invalidate the purported reinstatement order. This claim concerns only the present constitutionality of Petitioner's continued detention during a period in which the judicial stay prevents Respondents from executing his removal and no reasonably foreseeable event will end that restraint.

54. Petitioner is entitled to relief under 28 U.S.C. § 2241 because his continued detention violates the Due Process Clause of the Fifth Amendment.

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SECOND CAUSE OF ACTION
RESPONDENTS LACK STATUTORY AUTHORITY TO CONTINUE PETITIONER'S DETENTION

55. Petitioner realleges and incorporates by reference paragraphs 1 through 54 as if fully set forth herein.

56. Respondents continue to detain Petitioner under the purported authority of 8 U.S.C. § 1231. Petitioner's continued detention is unauthorized because the statutory removal period has not commenced under 8 U.S.C. § 1231(a)(1)(B)(ii).

57. Petitioner's pending Petition for Review before the United States Court of Appeals for the Ninth Circuit seeks judicial review of the purported reinstatement order itself and challenges the legality of the reasonable-fear proceedings through which Respondents contend they acquired authority to execute the purported reinstatement order. Among those procedural challenges is the Immigration Judge's refusal to permit Petitioner's retained counsel to participate during the reasonable-fear review, while limiting counsel's role to consultation with Petitioner before the hearing.

58. The Ninth Circuit has entered a judicial stay prohibiting Petitioner's removal that remains in effect while judicial review of those issues continues. Accordingly, Respondents presently lack authority to lawfully execute the purported reinstatement order unless and until the Ninth Circuit concludes its review and the stay is dissolved.

59. Congress expressly provided that, where a removal order is judicially reviewed and a court orders a stay of removal, the statutory removal period begins upon the date of the court's final order. 8 U.S.C. § 1231(a)(1)(B)(ii).

60. The United States Court of Appeals for the Ninth Circuit has recognized that, where judicial review of a removal order is accompanied by a judicial stay of removal, the statutory removal period does not commence until completion of that judicial review, and detention remains governed by the pre-removal detention provisions rather than 8 U.S.C. § 1231. *Prieto-Romero v. Clark*, 534 F.3d 1053, 1060–62 (9th Cir. 2008).

61. Petitioner's case presents the additional statutory question whether that same timing provision applies where pending judicial review encompasses the legality of the purported reinstatement order together with the proceedings through which Respondents contend they acquired authority to execute the purported reinstatement order. Those issues concern the legal prerequisites to Respondents' authority to lawfully execute the purported reinstatement order.

62. The authorities relied upon by Respondents addressed the detention authority governing ordinary withholding-only proceedings following reinstatement, where judicial review did not encompass the legality of the purported reinstatement order or the legal prerequisites to its lawful execution. Johnson v. Guzman Chavez, 594 U.S. 523 (2021); Padilla-Ramirez v. Bible, 882 F.3d 826, 830–32 (9th Cir. 2017). Those decisions therefore did not address the statutory question presented by this Petition.

63. Those decisions also did not consider the duration of the mandatory detention authority provided by 8 U.S.C. § 1231(a)(2), including whether it continues beyond the ninety-day removal period, where Congress separately provides that, if a noncitizen is not removed during that period, the noncitizen shall be subject to supervision under regulations prescribed by the Attorney General. 8

U.S.C. § 1231(a)(3).

64. The Ninth Circuit is reviewing the legality of the purported reinstatement order together with the legal prerequisites to its lawful execution, and Petitioner's removal remains stayed during that judicial review. Accordingly, the statutory removal period has not commenced under 8 U.S.C. § 1231(a)(1)(B)(ii).

65. Since the statutory removal period has not commenced, the mandatory detention authority provided by 8 U.S.C. § 1231(a)(2) has not been triggered. Respondents therefore lack statutory authority to continue detaining Petitioner pursuant to that provision.

66. The Immigration Judge's refusal to exercise custody jurisdiction rested upon *Matter of Yajure Hurtado*. Since that ruling, however, the Ninth Circuit has held that noncitizens present without admission who are apprehended in the interior of the United States are detained under 8 U.S.C. § 1226 rather than § 1225(b)(2)(A), rejecting the statutory interpretation adopted in *Matter of Yajure Hurtado*. *Rodriguez Vazquez v. Bostock*, No. 25-6842, slip op. at 2–5, 15, 20–21 (9th Cir. July 30, 2026). If Petitioner's detention is governed by § 1226,

67. The Immigration Judge's alternative statement that Petitioner was a danger due to criminal record likewise does not provide an independent statutory basis for Petitioner's continued detention. The order contains no individualized findings regarding Petitioner's present dangerousness or current risk of flight, no consideration of whether conditions of release could reasonably mitigate any identified risk, and no discussion of the absence of violent or recent criminal conduct. It therefore does not constitute the individualized custody determination

contemplated by 8 U.S.C. § 1226. See *Matter of Guerra,* 24 I. & N. Dec. 37, 40 (BIA 2006); *Prieto-Romero v. Clark,* 534 F.3d 1053, 1062–65 (9th Cir. 2008); *Singh v. Holder,* 638 F.3d 1196, 1203–07 (9th Cir. 2011).

68. Respondents have identified no statutory authority authorizing Petitioner's continued detention where the purported reinstatement order remains subject to judicial review, execution of that order is prohibited by judicial stay, the legal prerequisites to its execution remain unresolved, and Petitioner has not received the individualized custody determination required by law. Respondents' continued detention therefore exceeds the authority granted by the Immigration and Nationality Act and is unlawful.

69. Alternatively, if Respondents are correct that the pending Petition for Review concerns only country-specific withholding protection and does not delay execution of the purported reinstatement order, then the removal period began when the reinstated order became administratively final.

70. 70. Upon expiration of the ninety-day removal period, Section 1231(a)(2) no longer provides statutory authority for Petitioner's continued detention. See 8 U.S.C. § 1231(a)(2)–(3). Respondents have identified no other provision authorizing Petitioner's continued detention under the circumstances presented here.

71. Respondents' continued detention therefore exceeds the authority granted by the Immigration and Nationality Act and is unlawful.

72. Respondents continue to detain Petitioner without lawful statutory authority, entitling Petitioner to issuance of a writ of habeas corpus and declaratory relief.

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

A. Issue a writ of habeas corpus pursuant to 28 U.S.C. § 2241.

B. Declare that Petitioner's continued detention violates the Due Process Clause of the Fifth Amendment to the United States Constitution.

C. Declare that Respondents lack statutory authority under the Immigration and Nationality Act to continue Petitioner's detention under the circumstances presented herein.

D. Order Respondents to immediately release Petitioner from immigration custody.

E. Alternatively, should the Court determine that a further custody determination is necessary rather than immediate release, order Respondents to release Petitioner unless, within seven (7) days of the Court's Order, they provide Petitioner a prompt custody redetermination hearing before an Immigration Judge pursuant to 8 U.S.C. § 1226(a), conducted in accordance with the Fifth Amendment and controlling Ninth Circuit precedent. The hearing shall include an individualized assessment of Petitioner's present dangerousness and flight risk, consideration of the relevant custody factors and reasonable conditions of release, and contemporaneous individualized findings sufficient to permit meaningful judicial review.

F. Alternatively, should the Court conclude that Petitioner's detention is governed by 8 U.S.C. § 1231, declare that the ninety-day removal period has expired, that 8 U.S.C. § 1231(a)(2) no longer authorizes Petitioner's continued detention, and order Petitioner's release subject to such conditions of supervision

as Respondents are authorized by law to impose.

G. Issue declaratory relief pursuant to 28 U.S.C. §§ 2201–2202 declaring that Respondents' continued detention of Petitioner is unlawful.

H. Issue temporary, preliminary, and permanent injunctive relief as necessary to effectuate the Court's judgment, prohibit Petitioner's continued detention absent lawful statutory authority, and require that any custody redetermination hearing be conducted in accordance with the Fifth Amendment and controlling Ninth Circuit precedent.

I. Award Petitioner costs and attorneys' fees as authorized by law.

J. Grant such other and further relief as the Court deems just and proper.

Dated: August 3, 2026

Respectfully submitted,

s/Donovan J Dunnion .
Attorney for Petitioner
Javier Medina Escobar