UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(ALEXANDRIA DIVISION)

OSCAR ENRIQUE LOPEZ GARCIA,
Petitioner,

Case No. 1:25-cv-01764

PAUL PERRY, in his official capacity as Warden of Caroline Detention Facility
11093 S W Lewis Mem Dr, Bowling Green, VA 22427

JOSEPH SIMON, in his official capacity as Director of the Washington Field Office of U.S. Immigration and Customs Enforcement
14797 Murdock St, Chantilly, VA 20151

KRISTI NOEM, in her official capacity as Secretary of the U.S. Department Homeland Security
MS 0525 Department of Homeland Security
2707 Martin Luther King, Jr. Ave., SE
Washington DC 20528-0525

and

PAMELA BONDI, in her official capacity as Attorney General of the United States,
950 Pennsylvania Ave., NW
Washington DC 20530

Respondents.

PETITIONER'S PROPOSED RELEASE PLAN

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Pursuant to this Court's order of November 14, 2025 (Dkt. No. 6), the Petitioner, Mr. Oscar Enriquez Lopez Garcia ("Mr. Lopez"), through his undersigned counsel, hereby respectfully submits his proposed release plan.

Mr. Lopez returned to his stable residence at 1360 Peabody Street, NW, Apt. 13, Washington DC 20011 with his wife and two children. He has been at this fixed address for the past five years. Mr. Lopez has worked as a construction contractor for more than twenty years for the same family business and is promptly expected to resume his duties for the same business. Mr. Lopez will soon be reunited with his Church community and resume his activities and role as a Pre-Cana advisor. Mr. Lopez will continue working diligently with undersigned counsel to pursue immigration relief in the United States because his entire world remains here, his beloved family and community.

Respectfully submitted,



11/21/2025

Date

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