

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

Jesus Osvaldo Santos Barahona

c/o Immigrants First PLLC
9401 Centreville Rd, Suite 204
Manassas, VA 20110

Plaintiff,

v.

TODD M. LYONS, et al.

Respondents.

Case No. 1:25-cv-1889 (PTG/IDD)

PETITIONER'S MOTION FOR STATUS UPDATE

Petitioner moves this Honorable Court to issue a status update in the above-captioned proceeding, and states as follows:

1. Petitioner, Jesus Osvaldo Santos Barahona, has been in the physical custody of Respondents at the Farmville Detention Center in Farmville, Virginia since October 2, 2025.
2. Petitioner, through counsel, filed a petition for writ of habeas corpus on October 28, 2025. An initial order was issued on October 29, 2025 mandating that Petitioner not be removed or transferred outside the Court's jurisdiction without Court permission and further ordered the Petitioner to file a proposed release plan, which Petitioner filed by the Court's deadline. Respondents filed an opposition on November 5, 2025. The respondents were ordered to file a show cause filing by November 5, 2025, to which the respondents filed by November 5, 2025. Petitioner then filed an optional reply to Respondents' opposition on November 19, 2025.

3. Around a week ago, Petitioner's counsel called the court to ascertain the status of Petitioner's case. The Court clerk informed counsel that there were no outstanding orders from the Court and that the petition appeared to be ready for a decision.

4. Petitioner remains detained at the Farmville Detention Center awaiting a decision, causing him and his family considerable hardship. Petitioner would like to spend time with his family over Thanksgiving. Also, Petitioner has an individual merits hearing on December 8, 2025 with the immigration court and it would be more effective if he prepared for the hearing outside of detention.

5. Please also note that Maldonado Bautista district court decision which rejected Matter of Yajure Hurtado. See Exhibit A.

WHEREFORE, the undersigned respectfully requests that this Court provide a status update in the above-captioned case. Petitioner respectfully requests his immediate release from detention, and only in the alternative, other remedies as delineated in the habeas petition.

Respectfully submitted, this 26th day of November, 2025



David Sung Won Kim, Esq.
Attorney for Petitioner
Immigrants First, PLLC
9401 Centreville Rd, Ste 204
Manassas, VA 20110
(P) 703-342-8212
(F) 703-335-5755
(E) davidkim410@gmail.com