

R. Marcelo Avendano, Esq.

6528 Greenleaf Ave Ste. 108

Whittier, CA 90601

Email: marcelo@avendanolegal.com

Telephone: (562) 320-4265

Pro Bono Counsel for Jonathan Alejandro Nororis Escobar

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JONATHAN ALEJANDRO NORORIS)	Case No. 5:25-CV-02885
ESCOBAR,	)
Petitioner,	)
v.	)
Todd Lyons, Acting Director,	)
Immigration Customs and Enforcement;	)
and Ernesto Santacruz, Jr., Field Office	)
Acting Director for Enforcement and	)
Removal Operation	)
Respondents.	)
	)
	)
	)

1 Petitioner, through undersigned counsel, respectfully submits this Response
2 to Respondents' Answer and Suggestion of Mootness.

3 Petitioner acknowledges that, pursuant to this Court's November 4, 2025
4 Order, he received a bond hearing before an Immigration Judge on November 10,
5 2025, and was thereafter released from custody. Because the relief sought in the
6 Petition—namely, an order requiring that Petitioner be provided a bond hearing
7 under 8 U.S.C. § 1226(a)—has now been afforded, Petitioner agrees that the
8 habeas claims relating to custody are moot.

9 Petitioner therefore does not oppose dismissal of the Petition on mootness
10 grounds. Petitioner respectfully requests, however, that the Court note on the
11 record that the Petition was rendered moot only because Petitioner received the
12 bond hearing ordered by the Court, and that no adverse inference be drawn against
13 Petitioner for seeking such relief.

14 Petitioner is not seeking any additional relief at this time.

15 DATED: December 9, 2025

By:/s/ R. Marcelo Avendano

R. Marcelo Avendano

Pro Bono Attorney for Jonathan

Alejandro Nororis Escobar.