UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Marvin Obdulio QUINTEROS MORAN,

Petitioner,

v.

William JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Kristi NOEM in her official capacity as Secretary of Homeland Security; Pam BONDI, in her official capacity as Attorney General of the United States

Respondents

Case No. 1:25-cv-9645

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Respondents ask this Court to treat Petitioner as if he recently arrived at the U.S. border and is "on the threshold of initial entry" when in fact he was released on a $3,000 bond in July of 2013 and has lived in Queens, New York for the last twelve years.

In justifying his detention, Respondents argue that Mr. Quinteros Moran is detained pursuant to 8 C.F.R. § 1225(b)(1)(B)(ii) as someone in expedited removal proceedings found to have a credible fear of return and therefore subject to mandatory detention. While Mr. Quinteros Moran may have been initially placed in expedited removal, his status changed when he was placed in INA § 240 Removal Proceedings [8 U.S.C. § 1229a] following a positive credible fear determination. Contrary to the Respondent's position, the Notice of Custody Determination, Notice to Appear (identifying him as "present in the United States without having been admitted or paroled" as opposed to an "arriving alien"), and two I-200 "warrant(s) for arrest of alien" submitted by Respondents all state that Mr. Quinteros Moran was released and subsequently re-detained pursuant to 8 C.F.R. § 1226(a), not 8 C.F.R. § 1225(b). The Respondents cannot now, for the first time, claim he is subject to mandatory detention as a post hoc justification for an unconstitutional detention.

The Respondents rely on this same flawed argument to argue that Mr. Quinteros Moran should not be afforded basic constitutional due process protections because he should be considered to be "on the threshold of initial entry" to the United States, akin to someone on Ellis Island. Again, all evidence to the contrary. Mr. Quinteros Moran has resided in Queens for over a decade. Courts have found it "uncontroversial" that basic due process protections apply to citizens and noncitizens alike residing in the United States regardless of immigration status. The sudden re-detention of Mr. Quinteros Moran, absent any individualized assessment or even recognition that he is out on a bond, raises serious due process concerns.

To the extent that Respondents argue that "changed circumstances," such as contact with the criminal justice system, justified Mr. Quinteros Moran's re-detention, the record does not reflect that this was the case and, if it were, ICE should have followed its own court-required procedures to rescind the bond it issued in 2013.

For the reasons below and in his previous papers, Petitioner respectfully asks the Court to order his release from detention or, alternatively, order that Respondents provide Mr. Quinteros Moran with a bond hearing, enjoin them from denying bond based on the argument that Mr. Quinteros Moran is subject to mandatory detention, and enjoin them from invoking the automatic stay provision in 8 C.F.R. § 1003.19(i)(2) should a bond be granted.

I. PETITIONER WAS RELEASED IN 2013 PURSUANT TO 8 U.S.C. § 1226(a) AND DETAINED IN 2025 PURSUANT TO 8 U.S.C. § 1226(a) AND IS THEREFORE NOT SUBJECT TO MANDATORY DETENTION

From 2005 until 2019, the Board applied a rule that an individual in expedited removal under 8 U.S.C. § 1225(b)(1) [INA § 235(b)(1)] who obtained a positive credible fear detention and who was placed in removal proceedings under § 1229a [INA § 240] would be eligible for a bond redetermination hearing before an Immigration Judge. *Matter of X-K-*, 23 I. & N. Dec. 731, 733 (BIA 2005) (holding "once there is a final positive credible fear determination, whether that determination became final upon the asylum officer's initial positive credible fear determination, or upon the Immigration Judge's reversal of a negative one, an alien is no longer subject to a section 235(b)(1) expedited removal order."), *abrogated by Matter of M-S-*, 27 I. & N. Dec. 509, 515 (BIA 2019).[1] This was the legal framework at the time of Mr. Quinteros Moran's entry in 2013 and why he was released on bond pursuant to INA § 236 (codified in 8 U.S.C. § 1226(a))

[1] That *Matter of X-K-*, 23 I&N Dec. 731 (BIA 2005) was later abrogated by a 2019 A.G. decision in *Matter of M-S-*, 27 I&N Dec. 509 (BIA 2019) does not change that Mr. Quinteros was released under 8 U.S.C. § 1226(a) in 2013 and also, as explained below, re-detained in 2025 pursuant to 8 U.S.C. § 1226(a).

A. Mr. Quinteros Moran was released pursuant to 8 U.S.C. § 1226(a) in 2013.

Respondents first argue that Mr. Quinteros Moran is detained pursuant to 8 U.S.C. § 1225 (b)(1)(B)(ii) as someone who was placed in expedited removal and then passed a Credible Fear Interview and that he is therefore subject to mandatory detention. The Respondents ask this court to freeze Mr. Quinteros Moran's status at the point he was initially apprehended at the border in 2013 and to ignore everything that happened after that.

Both parties agree that when Mr. Quinteros Moran entered the United States in July of 2013, he was placed in expedited removal proceedings. *See* ECF No. 8-2, 'Notice of Expedited Removal.' When Mr. Quinteros Moran, who had fled Guatemala after being stabbed and nearly killed by gang members, expressed a fear of return to Guatemala, he was given a Credible Fear Interview (CFI) by an Asylum Officer. Once the Asylum Officer found that Mr. Quinteros Moran had a credible fear or persecution or torture in Guatemala, he was issued a Notice to Appear (NTA) and released on a $3,000 cash bond so that he could pursue his asylum claim in the United States. *See* ECF No. 8-3 and 8-4. The Notice to Appear designated him "An alien present in the United States who has not been admitted or paroled" and not an "arriving alien." *See* ECF No. 8-4.

Pursuant to Board precedent at the time, *Matter of X-K-*, 23 I. & N. Dec. 731 (BIA 2005), a non-citizen who is initially screened for expedited removal under 8 U.S.C. § 1225(b)(1)(A) but then passed a Credible Fear Interview and was placed in INA § 240 Removal proceedings is "no longer subject to a section 235(b)(1) expedited removal order" and therefore eligible for bond. This is consistent with the Notice of Custody Determination in the record which states that Mr. Quinteros Moran was released "pursuant to the authority contained in Section 236 of the

Immigration and Nationality Act" and that he may seek review of the bond by an Immigration Judge. *See* ECF No. 8-3. It is consistent with the fact that ICE, upon its positive fear determination, did set a bond of $3,000 and release Quinteros Moran.

B. Mr. Quinteros Moran's November 16, 2025 re-detention was pursuant to 8 U.S.C. § 1226(a)

When Mr. Quinteros Moran was suddenly re-detained in what appears to be a collateral arrest in his neighborhood in Jamaica, Queens, he was re-detained pursuant to 8 U.S.C.§ 1226(a). This is what is reflected in the documents related to his arrest and it is also legally correct as ICE was not detaining someone trying to enter at the border but a long term resident of Queens with pending removal proceedings. *Jennings v. Rodriguez*, 583 U.S. 281, 281 (2018) ("The Government is also authorized to detain certain aliens already in the country. Section 1226(a)'s default rule permits the Attorney General to issue warrants for the arrest and detention of these aliens pending the outcome of their removal proceedings."); *Lopez Benitez v. Francis*, No. 25-Civ-5937 (DEH), 2025 WL 2267803, at *5 (S.D.N.Y. Aug. 8, 2025) (distinguishing 8 U.S.C. § 1225(a) detention authority from 8 U.S.C. § 1226(a) detention authority which governs detention of noncitizens "already in the country.")

Respondents submit two I-200 "Warrant[s] for Arrest of Alien" dated on August 5, 2025 and November 16, 2025. The warrant dated August 5, 2025 is unsigned and the certificate of service is blank except for Mr. Quinteros Moran's typed name. The warrant dated November 16, 2025, the day of Mr. Quinteros Moran's detention, is signed and purports to be served on Mr. Quinteros Moran, but no basis for detention is checked off on the document. Regardless, both warrants state explicitly that the detention is authorized by INA § 236 (Codified at 8 U.S.C. § 1226(a)) and INA § 287, not INA § 235 (Codified at 8 U.S.C. § 1225 (b)). The one document

Mr. Quinteros Moran has been provided with in detention appears to be a settlement document outlining his rights as someone detained pursuant to INA § 236(a) including a right to request custody review before an immigration judge. (Exh. 2 of Petitioner's Reply)

As the Court noted in *Rueda Torres v. Francis*, ICE "cannot reverse course now and claim that [petitioner] is an arriving alien "seeking admission" to the United States who is subject to mandatory detention." No. 25-Civ-8408 (DEH), 2025 WL 3168759, at *3 (S.D.N.Y. Nov. 13, 2025). The Court found ICE's past treatment of Rueda Torres' custody status to be "fatal" to its newly argued claim that she is subject to mandatory detention. The same is true here, where Mr. Quinteros Moran's detention was treated as governed by 8 U.S.C. § 1226(a), even including the date of his most recent detention, and Respondents are only after the fact arguing that he is subject to mandatory detention.[2]

In support of its argument, Respondents rely primarily on *Jennings v. Rodriguez*, 583 U.S. 281 (2018), and *DHS v. Thuraissigiam*, 591 U.S. 103, 109-13 (2020). Neither case is particularly on point. While *Jennings v. Rodriguez* discusses the various authorities for detention, it does not address which authority someone in Mr. Quinteros Moran's situation was or should be detained under. And Mr. Thuraissigiam, unlike Mr. Quinteros Moran, was detained at the border, failed his CFI, and was never released. The question at issue there was whether he had access to habeas proceedings and the Supreme Court found he did not.

II. PETITIONER HAS BEEN LIVING IN THE UNITED STATES FOR OVER A DECADE AND IS ENTITLED TO BASIC DUE PROCESS PROTECTIONS

[2] While the Respondent makes a point to state that "this is not the typical Section 1225 versus Section 1226 case" that has led many courts in this district to reject the reasoning in *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025), *see* Respon.'s Opp'n Br. at 10, the Respondent's argument that Mr. Quinteros Moran's status be frozen forever at the moment of his entry relies heavily on reasoning in *Yajure Hurtado* that federal courts have overwhelmingly rejected.

A. Mr. Quinteros Moran is not "on the threshold of initial entry" to the United States but rather a resident of Queens for over a decade.

Mr. Quinteros Moran was released from ICE custody on bond in 2013 and has been living in Queens for over a decade but Respondents ask this Court to pretend that, for purposes of his right to basic constitutional protections, he is at Ellis Island "on the threshold of initial entry." The Court should decline to do so. As argued above, the legal fiction this position relies upon of Mr. Quinteros Moran "seeking admission" in perpetuity is not supported by the documents in record and his case is factually distinct from *Mezei*, whose position relied upon a finding that his "harborage at Ellis Island" be considered entry into the United States, and the other cases cited by the Respondent. The Respondents rely on the same flawed reasoning cited above for their position that Mr. Quinteros Moran be denied basic due process protections.

The situation of Meizi, who had been previously ordered excluded from the United States and was currently being detained at Ellis Island while the U.S. attempted to find a country to send him to when his home country would not accept him, is not analogous to the case at hand in any meaningful way. Meizi was someone whose entry into the United States had already been denied. *Shaughnessy v. United States ex rel. Mezei,* 345 U.S. 206, 212 (1953). As the Court in *Al-Thuraya v. Warden* noted, two additional cases cited by the government here, *Poonjani v. Shanahan*, 319 F. Supp. 3d 644 (S.D.N.Y. 2018), and *Mendez Ramirez v. Decker*, 612 F. Supp. 3d 200 (S.D.N.Y. 2020), ignored these crucial differences when they relied upon *Mezei*. *Poonjani* is also factually distinct from Mr. Quinteros Moran's case. Poonjani had been detained pursuant to 8 U.S.C. 1225(b) and had been paroled in as opposed to released on bond like Mr. Quinteros Moran. *Al-Thuraya v. Warden*, No. 25-CV-2582 (AS), 2025 WL 2858422 (S.D.N.Y.

Oct. 9, 2025).[3]

B. Mr. Quinteros Moran, like all persons within the United States regardless of immigration status, is entitled to basic due process protections

As this Court found in *Valdez v. Joyce*, 1:25-Civ-04627 (GBD), 2025 WL 1707737, at *2 (S.D.N.Y. June 18, 2025), "The Fifth Amendment's Due Process Clause prevents the Government from depriving any person of 'life, liberty, or property, without due process of law.' U.S. Const. amend. V. 'Freedom from imprisonment-from government custody, detention, or other forms of physical restraint lies at the heart of the liberty [the Due Process Clause] protects.' *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001)."[4]

Once a noncitizen is residing in the United States and "begins to develop ties," the due process afforded to them "changes accordingly." *Landon v. Plasencia*, 459 U.S. 21, 32 (1982), *citing Johnson v. Eisentrager*, 339 U.S. 763, 770 (1950). As a person living within the United States, Mr. Quinteros Moran is entitled to basic constitutional protections, including due process protections under the Fourth and Fifth Amendments. *Reno v. Flores,* 507 U.S. 292, 306 (1993) ("'[T]he Due Process clause applies to all 'persons' within the United States, including aliens,

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[3] The Respondents also cite to three cases in other District Courts: *Gonzalez Garcia v. Rosen*, 513 F. Supp. 3d 329 (W.D.N.Y. 2021), *D.A.V.V. v. Warden*, 7:20-CV-159-WLS-MSH, 2020 WL 13240240 (M.D. Ga. Dec. 7, 2020), and *Salim v. Tryon*, 25 Civ. 6373 (DEH), 2025 WL 2398831 (S.D.N.Y. Aug. 19, 2025). It appears that all three cases were of noncitizens subject to mandatory detention, or at least not challenging that they were detained pursuant to 8 U.S.C. 1225(b) and 8 U.S.C. § 1226(c). That is not the case here. The Respondents also cite to a 1952 Supreme Court case *Carlson v. Landon*, 342 U.S. 524 related to noncitizens being held as "security threats" due to association with the Communist party. This is also not instructive in the case at hand.

[4] The Respondents distinguish this case from *Valdez*, by arguing that Mr. Valdez, unlike Mr. Quinteros Moran, was detained under 8 U.S.C. § 1226(a). But for the reasons argued above, this record does not support such a distinction.

whether their presence here is lawful, unlawful, temporary, or permanent."); *Leng May Ma v. Barber*, 357 U.S. 185, 187 (1958) ("It is important to note at the outset that our immigration laws have long made a distinction between those aliens who have come to our shores seeking admission . . . and those who are within the United States after an entry, irrespective of its legality."); *Sicajao Cotzojay v. Holder*, 725 F.3d 172, 181 (2d Cir. 2013) ("[I]t is uncontroversial that the Fourth Amendment applies to aliens and citizens alike").

The sudden re-detention of noncitizens who were previously released into the interior of the United States without an individualized assessment, notice, and opportunity to respond presents serious due process concerns under *Mathews v. Eldridge*, 424 U.S. 319 (1976). Courts in this district and around the country have found constitutional violations in ICE's abrupt detentions of individuals like Mr. Quinteros Moran with no pre-deprivation notice or opportunity to be heard before they lose their liberty and are subjected to highly restrictive, jail-like conditions of detention. *See, e.g.*, *Hyppolite v. Noem*, 25-CV-4304 (NRM), 2025 WL 2829511, at *13-15 (E.D.N.Y. Oct. 6, 2025); *Artiga v. Genalo*, 25-CV-5208 (OEM), 2025 WL 2829434, at *9 (E.D.N.Y. Oct. 5, 2025); *Chipantiza-Sisalema v. Francis*, 2025 WL 1927931, at *3 (S.D.N.Y. July 13, 2025) ("ICE summarily detained Chipantiza-Sisalema pursuant to an agency policy of arbitrary detention without affording her notice or opportunity to be heard."); *Rueda Torres v. Francis*, No. 1:25-Civ-08408 (DEH), 2025 WL 3168759, at *6 (S.D.N.Y. 2025) ("There is nothing to suggest that DHS exercised any discretion at all in detaining [Rueda Torres] such as an individualized assessment as to….dangerousness or flight risk, or any kind of process at all sufficient to qualify as a valid exercise of discretion," *citing to Samb v. Joyce,* No. 25-Civ. 6373 (DEH), 2025 WL 2398831, at *3 (S.D.N.Y. Aug. 19, 2025)). Just as in *Rueda Torres v. Francis*, Respondents here do not even argue that there was an "individualized assessment" but rather that

none was needed because Mr. Quinteros Moran is subject to mandatory detention.

III. TO THE EXTENT THAT RESPONDENTS RELY ON "CHANGED CIRCUMSTANCES" TO JUSTIFY PETITIONER'S DETENTION, THIS IS A POST HAC JUSTIFICATION NOT SUPPORTED BY THE RECORD

The Court should not credit post hoc justifications made in litigation as the basis for an individual's detention. *Lopez Benitez v. Francis*, No. 25-Civ-5937 (DEH), 2025 WL 2371588, at *5 (S.D.N.Y. Aug. 13, 2025), *citing Dep't of Homeland Sec. v. Regents of the Univ. of Cal.*, 591 U.S. 1, 21-22, 24 (2020) (under arbitrary and capricious review in the administrative law context, "[t]he basic rule here is clear: An agency must defend its actions based on the reasons it gave when it acted," not on "impermissible post hoc rationalizations").

A. The record does not support Respondents' assertion that Mr. Quinteros Moran was detained as part of a "targeted enforcement operation" targeting him due to his August 5, 2025 arrest

In a footnote, the Respondent suggests that Mr. Quinteros Moran may be detained based on "changed circumstances." Respon.'s Opp'n Br. at 14 n.8, ECF No. 9. The Respondent's brief states that Mr. Quinteros Moran was detained during a "targeted enforcement operation" in which he was the target following his August 5, 2025 arrest by the NYPD. The record does not support this claim.

Mr. Quinteros Moran states that he was approached by ICE agents on the street who showed him a photograph of a man he did not know. When he stated he did not know the person they were looking for, they asked Mr. Quinteros Moran where he was from and what his immigration status was. He answered honestly, telling them that he was an asylum applicant from Guatemala but he did not have his immigration paperwork on him. He was then detained. Only after he was already handcuffed did they ask him whether he had ever been arrested.

Quinteros Moran Decl. ¶ 15. The Form I-213 from November 16, 2025 that the Respondents submit supports Mr. Quinteros Moran's account that he was a collateral arrest rather than the target of an enforcement operation. The I-213 states that agents conducted a "consensual encounter" with Mr. Quinteros Moran during a targeted enforcement operation "to gain information on the intended target" (suggesting that he was not the intended target) and that upon speaking to Mr. Quinteros Moran he "freely provided" the information about his place of birth and manner of entry they then used to detain him. It states that at this point background checks were run and it was determined that he did have immigration history, including a removal order.[5] It further stated that he was detained "pursuant to a signed I-200 (warrant for arrest)." As the August 5, 2025 I-200 warrant was never signed, this can only be referring to the warrant that was drawn up and served on the day of his detention. ECF No. 8-7.

The Declaration submitted by Officer Minchoel So also suggests that the November 16, 2025 detention was the result of a targeted operation with Mr. Quinteros Moran as the target. However, Officer So does not purport to have been involved with the November 16, 2025 detention and states that his declaration is based upon his "review of Quinteros' administrative file, consultation with my colleagues' and ICE electronic records and databases." So Decl. ¶ 2, ECF No. 10. The arresting officer is identified in the I-213 as a Special Agent Sameroo. Nothing in record supports a connection between the August 5, 2025 arrest and the November 16, 2025 detention. There is nothing to suggest that the officers who detained Mr. Quinteros Moran even knew about it until after he had already been detained.

In light of this, the Respondents' repeated references to Mr. Quinteros Moran's arrest

[5] The Removal Order issued on July 29, 2024 is not a final order of removal because Mr. Quinteros Moran filed a timely appeal to the Board of Immigration Appeals and that appeal remains pending.

history are gratuitous where the Respondent is not arguing that he is subject to 8 C.F.R. § 1226(c) mandatory detention based on criminal convictions or that he poses a danger to the community.[6]

B. Where DHS wishes to revoke a bond due to changed circumstances, it must follow 8 § C.F.R. 242.2(e)

The Second Circuit has been clear that in the context of civil detention, "an individual whose release is sought to be revoked is entitled to due process such as notice of the alleged grounds of revocation, a hearing, and the right to testify at such a hearing." *Villiers v. Decker,* 31 F.4th 825, 833 (2d Cir. 2022); *see also Valdez*, 2025 WL 1707737, at *2, *citing to Lopez v. Sessions*, 18-Civ.-4189 (RWS), 2018 WL 2932726, at *12 (S.D.N.Y. June 12, 2018) ("Petitioner's re-detention, without prior notice, a showing of changed circumstances, or a meaningful opportunity to respond, does not satisfy the procedural requirements of the Fifth Amendment.").

According to 8 C.F.R. § 242.2(e), certain people within the Department have the authority to revoke a previously issued bond: The District Director, Assistant Director, Deputy District Director, Assistant District Director for Investigations, or Officer in charge of an office enumerated in 8 C.F.R. 242.1(a). The Board, in *Matter of Sugay*, 17 I&N Dec. 637, 639-40 (BIA 1981), noted that bond redetermination or revocation by the District Director may not be

[6] Mr. Quinteros Moran's August 5, 2025 arrest resulted in a charge of a violation of consuming alcohol in the street and was Adjourned in Contemplation of Dismissal to be dismissed and sealed on February 4, 2026. Mr. Quinteros Moran's history of minor arrests reflect a struggle with homelessness. Since being the victim of a stabbing in late August, he has been sober, attending AA meetings, and had found a room to rent in his neighborhood until his ICE arrest. Quinteros Moran Decl. ¶¶ 11-12. Although respondents recount his arrest history in detail, they do not argue that he has any convictions subjecting him to mandatory detention under 8 U.S.C. § 1226(c) or that he is a danger to the community.

"arbitrary and capricious" and should be based on "changed circumstances." When a bond is revoked, there should be a determination of whether the bond was breached and, if not, the bond should be cancelled and money returned to the obligor. 8 C.F.R. § 242.2(e). Courts have read Sugay to require changed circumstances prior to retention and has also that those changed circumstances be sufficiently material. *Panosyan v. Mayorkas,* 854 F. App'x 787, 788 (9th Cir. 2021) (Thus, absent changed circumstances ... ICE cannot redetain Panosyan."); *Saravia v. Barr,* 280 F. Supp. 3d 1168 (N.D. Cal. 2017).

It is not clear from this record that any pre-deprivation process or assessment of materially changed circumstances ever happened at all. Mr. Quinteros Moran was simply told he was being detained as someone without legal status. To date, Mr. Quinteros Moran has not received any documents suggesting that his bond has been revoked at all, let alone that there has been any individualized assessment as to whether there are sufficiently material changed circumstances or the bond has been breached.

IV. IMMEDIATE RELEASE IS THE PROPER REMEDY FOR THE CONSTITUTIONAL VIOLATIONS COMMITTED IN THIS CASE

For the reasons stated above, Mr. Quinteros Moran first requests his immediate release. District Courts have found in cases such as this, where noncitizens are swept up without any pre-detention individualized assessment, immediate release is the proper remedy. In *Lopez Benitez v. Francis*, the Court found that "any postdeprivation review by an immigration judge would be inadequate" where no individualized assessment was conducted prior to detention. 2025 WL 2371588 at *14. In *Chipantiza-Sisalema v. Francis*, the Court found that, "The suggestion that government agents may sweep up any person they wish, for any reason, and hold that person in the conditions in which [the petitioner] was held and is being held without

consideration of dangerousness or flight risk so long as the person will, a some unknown point in time, be allowed to ask some other official for his or her release offends the ordered system of liberty that is the pillar of the Fifth Amendment." 25 WL 1927931 at *3.

If the Court orders a bond hearing, Mr. Quinteros Moran respectfully requests that the Court further enjoin the Respondents from denying bond on the clearly erroneous grounds that Mr. Quinteros Moran is subject to mandatory detention and that, in the event that Mr. Quinteros Moran is granted a new bond, that Respondents be enjoined from invoking the automatic stay provision on 8 C.F.R. § 1003.19(i)(2) thus staying the bond during the pendency of their appeal.

V. CONCLUSION

For the reasons argued above, Petitioner respectfully requests this Court to grant his Writ of Habeas Corpus and order his immediate release.

Dated: December 5, 2025

Respectfully submitted,

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Certificate of Compliance

Pursuant to Local Civil Rule 7.1(c) and Section III.D of the Court's Individual Practices, the above-named counsel hereby certifies that this memorandum complies with the word-count limitation of this Court's Local Civil Rules and the Court's Individual Practices. As measured by the word processing system used to prepare it, this memorandum contains 4196 words.

Dated: December 5, 2025

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