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IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Edgar Ruiz Rojas

Petitioner,

v.

Joshua JOHNSON, CoreCivic Acting Warden ICE
Adelanto Processing Center; James CHIANG,
Acting Field Officer Director, U.S. Immigration
and Customs Enforcement (ICE) Los Angeles
Field Office; Kristi NOEM, Secretary, United
States Department of Homeland Security; Pamela
BONDI, Attorney General of the United States;
Darren K. MARGOLIN, Director, Executive
Office for Immigration Review

Respondents.

PETITIONER'S REPLY TO
FEDERAL RESPONDENTS'
ANSWER TO PETITION FOR
WRIT OF HABEAS CORPUS

Case No. 5:25-cv-03164-DSF-DSR

Agency Case Number:

A 

In light of the Federal Respondents' agreement (as stated in their answer) that
Petitioner **Edgar Ruiz Rojas** is a member of the Bond Eligible Class certified by Judge
Sykes of this court in *Maldonado Bautista v. Santacruz*, Case No. 5:25-cv-01873-SSS-BFM

(C.D. Cal. Nov. 25, 2025), Petitioner respectfully moves this Court to recognize and enforce the authority of Judge Syke's ruling in this case. Specifically, Petitioner requests that this court order that, following *Maldonado Bautista* as a matter of law, he is not 'seeking admission' as that phrase is used in 8 U.S.C. §1225(b)(2)(A), and despite the Board of Immigration Appeal's administrative decision in *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025) he is not subject to mandatory detention without bond. To the contrary, on the facts of Petitioner's situation, and as a class member of the Bond Eligible Class, Petitioner is subject to the bond provisions of 8 U.S.C. §1226. Those legal and factual findings are grounded in the record before this Court and therefore Petitioner respectfully requests that this court Order the Respondents to immediately provide Petitioner with a bond hearing under 8 U.S.C. § 1226(a). An explicit, detailed, precise Order from this court is required, given the position taken by the Chief Immigration Judge, that because *Maldonado Bautista v. Santacruz* "is not a nationwide injunction and does not purport to vacate, stay, or enjoin *Yajure Hurtado*. Therefore, *Yajure Hurtado* remains binding precedent on agency adjudicators." Exhibit 1, January 13, 2026 email from Chief Immigration Judge Teresa L. Riley to all Immigration Judges; January 16, 2026 Practice Advisory from the American Immigration Lawyers Association.

I. Relief Has Already Been Adjudicated and Granted

As the Respondents have recognized in their Answer, this court, in *Maldonado Bautista*, certified a habeas class and entered class wide relief governing the legality of the detention practices at issue. Unless and until otherwise stayed by a higher court, that relief binds Respondents as to all class members, including Petitioner. See Fed. R. Civ. P. 23(c)(3); *Cooper v. Federal Reserve Bank*, 467 U.S. 867, 874 (1984).

II. Respondents' Continued Conduct Violates the Class Order

Despite Petitioner's class membership, Respondents have failed to implement the relief awarded in *Maldonado Bautista* as applied to Petitioner. Exhibit 2, IJ Order denying Bond. Continued detention and/or denial of the procedures mandated by the class order constitutes non-compliance with a binding habeas judgment.

III. Requested Relief

Petitioner respectfully requests that the Court:

1. Issue an immediate Order explicitly recognizing that Petitioner is a member of the Bond Eligible Class defined in *Maldonado Bautista*.
2. Order Respondents to comply with the class wide habeas relief granted in *Maldonado Bautista* as applied to Petitioner;
3. Direct Respondents to implement the required relief in the form of a 8 U.S.C. § 1226(a) bond hearing within seven (7) days, or release the Petitioner;
4. Decline to entertain any collateral attack on the validity, scope, or merits of the class order; and
5. Grant such further relief as necessary to effectuate compliance.
6. This motion seeks no expansion of the class relief—only its enforcement as to this class member.

Respectfully Submitted this 16th day of January, 2026.

STOWELL CRAYK, PLLC

/s/ Marti L. Jones
Attorney for Petitioner

List of Exhibits

Exhibit 1: January 13, 2026 email from Chief Immigration Judge Teresa L. Riley to all Immigration Judges, as posted on AILA Infonet with practice advisory.

Exhibit 2: IJ Order denying Bond.