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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

10

11 Jonny Alexander Escobar,
Petitioner,

12

13 v.

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15 CHRISTOPHER CHESTNUT, Warden,
California City Correctional Facility;
ORESTES CRUZ, Acting Field Office
Director of San Francisco Field Office, U.S.
16 Immigration and Customs Enforcement;
KRISTI NOEM, Secretary of the U.S.
17 Department of Homeland Security; TODD M.
LYONS, Acting Director, U.S. Immigration
18 and Customs Enforcement; and PAMELA
19 BONDI, Attorney General of the United
States,

20 Respondents.

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Case No. 1:25-cv-01801-DJC-EFB

**AMENDED PETITION FOR WRIT OF
HABEAS CORPUS**

Hon. Judge Edmund F. Brennan

INTRODUCTION

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3 1. Petitioner Jonny Alexander Escobar (“Mr. Escobar” or “Petitioner”) brings a
4 straight-forward habeas petition seeking relief pursuant to mandatory statutory, regulatory, and due
5 process protections in connection with imminent removal to a third country without any meaningful
6 opportunity to assert a fear-based claim for withholding of removal. Mr. Escobar is a Salvadoran
7 national who has been in detention for over two years in the custody of the United States
8 Department of Homeland Security (“DHS”), Immigration and Customs Enforcement (“ICE”) at
9 Golden State Annex (“GSA”) in McFarland, California, and most recently, California City
10 Detention Facility in California City, California. On October 10, 2025, an immigration judge (IJ)
11 granted Mr. Escobar protection under the Convention Against Torture (“CAT”) to El Salvador under
12 8 C.F.R. § 208.16(c)(2) because Mr. Escobar would more likely than not be tortured if deported
13 there based on his fear of persecution from MS-13 and Salvadoran authorities. Exhibit A, Order of
14 IJ Granting CAT; Exhibit B, Digital Audio Recording.

15 2. On December 10, 2025, eight weeks, after his CAT grant became final, Mr. Escobar
16 was informed by ICE that it would attempt to remove him to a third country. Exhibit C, Decl. of
17 Sarah Houson. ICE informed Mr. Escobar that they would seek his removal to Mexico or to another
18 country in Africa. *Id.* Mr. Escobar is not a citizen of and has no connection to any of those
19 countries. *Id.* Accordingly, to vindicate Mr. Escobar’s statutory, constitutional, and regulatory
20 rights, this Court should grant the instant petition for a writ of habeas corpus.

21 3. Absent an order from this Court, Mr. Escobar faces imminent removal to a third
22 country without proper notice or the opportunity to be heard in violation of his due process rights.

23 4. Petitioner asks this Court to find that Respondents are prohibited from removing Mr.
24 Escobar via a third-country deportation without providing him and his counsel with meaningful
25 notice and opportunity to assert a fear-based claim

JURISDICTION

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27 5. Mr. Escobar is detained in Respondents’ custody at California City.
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1 12. Respondent Christopher Chestnut is the Warden of Californica City detention
2 facility, and he is responsible for the physical custody of Petitioner.

13. Respondent Orestes Cruz is the acting director of the regional ICE Field Office an agency of the United States responsible for the administration of the immigration laws. 8 U.S.C. § 1103(a). He is legal custodian of Petitioner. He is named in her official capacity.

6 14. Respondent Kristi Noem is the Secretary of the Department of Homeland Security
7 ("DHS"). She is responsible for overseeing DHS and its sub-agency, ICE, and has ultimate
8 responsibility for the detention of noncitizens in civil immigration custody. Respondent Noem is a
9 legal custodian of Petitioner. She is named in her official capacity.

10 15. Respondent Todd M. Lyons is the Acting Director for ICE. Respondent Lyons is
11 responsible for ICE's policies, practices, and procedures, including those relating to the detention
12 of immigrants. He is named in his official capacity.

13 16. Respondent Pamela J. Bondi is the Attorney General of the United States and the
14 head of the Department of Justice (“DOJ”), which encompasses the BIA and immigration judges
15 as part of its sub-agency, the Executive Office for Immigration Review (“EOIR”). Respondent
16 Bondi has the authority to interpret the immigration laws and adjudicate removal cases and bond
17 hearings. *See* 8 U.S.C. § 1103(g). She has delegated that power to the nation’s immigration judges
18 and the BIA. Respondent Bondi is a legal custodian of Petitioner. She is sued in her official
19 capacity.

STATEMENT OF FACTS

21 17. Mr. Escobar a citizen of El Salvador. *See* Ex. B. He is not a citizen of any country
22 besides El Salvador, nor does he have ties to any other country. Ex. D ¶ 14.

23 18. Mr. Escobar suffered repeated persecution by both police and [REDACTED] gang members.
24 Mr. Escobar came to the United States on September 05, 2022, and was subsequently detained by
25 immigration officials and placed in immigration proceedings. He has been in immigration custody
26 ever since. *See* Ex. D ¶ 3-4.

27 19. An IJ granted Mr. Escobar deferral of removal to El Salvador under the Convention
28 Against Torture on October 10, 2025. DHS did not appeal this grant. *See* Ex. D ¶ 3-4.

20. On October 13, 2025, Mr. Escobar's immigration counsel communicated with ICE outlining her client's fear of removal to any third country in which [REDACTED] has a presence, and the additional safeguards he is entitled to as a *Franco Gonzalez* class member. Exhibit C, Email to ICE.

21. On December 10, 2025, eight weeks after his CAT grant became final, Mr. Escobar was informed by ICE that it would attempt to remove him to a third country. Ex. D ¶ 5. ICE informed Mr. Escobar that they would seek his removal to Mexico or a country in Africa. *Id.* ¶¶ 7, 10. The officer provided a list of countries in Africa including South Sudan, Ghana, Libya, Uganda, Equatorial Guinea, and Rwanda. *Id.* ¶ 10. Mr. Escobar is not a citizen of and has no connection to any of these countries. *Id.* ¶ 14. Mr. Escobar's attorney attempted to contact ICE by both phone and email numerous times that same afternoon. *Id.* ¶¶ 11, 13. Once again, Mr. Escobar's counsel attempted to inform ICE of the additional safeguards provided to Mr. Escobar as a Franco Gonzalez class member, and explain that Mr. Escobar fears removal to each of the identified countries and demand ICE comply with its obligations to provide Mr. Escobar with sufficient notice and meaningful opportunity to reopen removal proceedings upon a potential designation of any third country for removal. *Id.* ¶ 11. No one from either the detention center or ICE Field Office ever responded. *Id.* Respondents did not respond to Mr. Escobar's counsel. *Id.*

LEGAL FRAMEWORK

I. Law and Procedure Governing this Habeas Petition.

22. The “historic purpose of the writ” of habeas corpus is “to relieve detention by executive authorities without judicial trial.” *Zadvydas v. Davis*, 533 U.S. 678, 699 (2001) (cleaned up). A writ under 28 U.S.C. § 2241 may issue if, among other things, a person “is in custody under or by color of the authority of the United States,” or is “in custody in violation of the Constitution or laws or treaties of the United States.” 8 U.S.C. § 2241(c). A habeas court’s role is at its “most extensive in cases of pretrial and noncriminal detention,” especially “where there ha[s] been little or no previous judicial review of the cause for detention.” *Boumediene v. Bush*, 553 U.S. 723, 780 (2008). A court “entertaining an application for a writ of habeas corpus shall forthwith award the writ or issue an order directing the respondent to show cause why the writ should not be granted, unless it appears from the application that the applicant or person detained is not entitled thereto.”

1 28 U.S.C. § 2243. “The writ, or order to show cause shall be directed to the person having custody
2 of the person detained. It shall be returned within three days unless for good cause additional time,
3 not exceeding twenty days, is allowed.” *Id.*

4 23. Once the government files its return, the Court shall set a “hearing, not more than
5 five days after the return unless for good cause additional time is allowed.” *Id.* “The court shall
6 summarily hear and determine the facts, and dispose of the matter as law and justice require.” *Id.*

7 **II. Deferral of Removal Under CAT and Related Relief Under the Immigration**
8 **and Nationality Act**

9 24. Non-citizens in immigration removal proceedings may seek three main forms of
10 relief based on a fear of returning to their home country: asylum, withholding of removal, and CAT
11 relief. When an IJ grants a non-citizen withholding or CAT relief, the IJ both issues a removal
12 order and simultaneously withholds or defers that order with respect to the country or countries for
13 which the non-citizen demonstrated a sufficient risk of persecution or torture. *See Johnson v.*
14 *Guzman Chavez*, 141 S. Ct. 2271, 2283 (2021). *See also Jama v. ICE*, 543 U.S. 335, 348 (2005)
15 (explaining that individuals who “face persecution or other mistreatment in the country designated”
16 as their place of removal “have a number of available remedies,” by statute, regulation, and under
17 international law, to “ensur[e] their humane treatment”).

18 25. When a non-citizen has a final withholding or CAT relief grant, they cannot be
19 removed to the country or countries for which they demonstrated a sufficient likelihood of
20 persecution or torture. *See* 8 U.S.C. § 1231(b)(3)(A); 8 C.F.R. § 1208.17(b)(2). While ICE is
21 authorized to remove non-citizens who were granted withholding or CAT relief to alternative
22 countries, *see* 8 U.S.C. § 1231(b); 8 C.F.R. § 1208.16(f), the removal statute specifies restrictive
23 criteria for identifying appropriate countries. Non-citizens can be removed, for instance, to the
24 country “of which the [non-citizen] is a citizen, subject, or national,” the country “in which the
25 [non-citizen] was born,” or the country “in which the [non-citizen] resided” immediately before
26 entering the United States. 8 U.S.C. § 1231(b)(2)(D)–(E).

27 26. If ICE identifies an alternative country of removal, the “noncitizen must be given
28 sufficient notice of a country of deportation that, given his capacities and circumstances, he would

1 have a reasonable opportunity to raise and pursue his claim for withholding of deportation.” *Aden*
 2 *v. Nielsen*, 409 F. Supp. 3d 998, 1009 (W.D. Wash. 2019). This means “notice must be afforded
 3 within a reasonable time and in such a manner as will allow them to actually seek habeas relief in
 4 the proper venue before such removal occurs.” *Trump v. J. G. G.*, 145 S. Ct. 1003, 1006 (2025)
 5 (citing *Reno v. Flores*, 507 U.S. 292, 306 (1993)). To be sure, “there can be no disagreement that
 6 the same constitutional guarantees apply to withholding-only relief.” *D.V.D.*, 778 F.Supp.3d at 387.

7 **III. Removal to a Third Country Must Comport with the Statutes and**
 8 **Regulations Governing Immigration Detention and Due Process**

9 27. “Failing to notify individuals who are subject to deportation that they have the right
 10 to apply for asylum in the United States and for withholding of deportation to the country to which
 11 they will be deported violates both INS regulations and the constitutional right to due process.”
 12 *Andriasian v. I.N.S.*, 180 F.3d 1033, 1041 (9th Cir. 1999) (finding that “last minute” designation of
 13 alternative country without meaningful opportunity to apply for protection “violate[s] a basic tenet
 14 of constitutional due process”). *See also Najjar v. Lynch*, 630 Fed. App’x. 724 (9th Cir. 2016)
 15 (same).

16 28. The case law is clear: in accord with the fear-based claim legal framework, the
 17 Government is obligated to provide non-citizens with mandatory statutory and due process
 18 protections prior to removing them to a third country. Since the current administration has taken
 19 office, it has attempted to increase its deportation of non-citizens to third countries by any means
 20 necessary—mostly blatantly unlawful ones. One such process is removing noncitizens with
 21 withholding or CAT relief to third countries with little to no notice.

22 29. On March 23, 2025, a putative nationwide class challenged this government practice
 23 in *D.V.D. v. DHS* and obtained a temporary restraining order and later a preliminary injunction for
 24 a certified class, blocking third country removals without notice and a meaningful opportunity to
 25 seek CAT protection. *D.V.D. v. DHS*, 778 F. Supp. 3d 355, 392–93 (D. Mass. Apr.18, 2025). Under
 26 the *D.V.D.* injunction, the government was required to provide class members the following:

- 1 • Written notice of the third country in a language that the non-citizen can understand
- 2 to the individual and their attorney, if any,
- 3 • An automatic 10-day stay between notice and any actual removal,
- 4 • Ability to raise a fear-based claim for CAT protection prior to removal, and:
- 5 ○ If the noncitizen demonstrates “reasonable fear” of removal to the third
- 6 country, DHS must move to reopen the noncitizen’s immigration
- 7 proceedings.
- 8 ○ If the noncitizen does not demonstrate a “reasonable fear” of removal to the
- 9 third country, DHS must provide a meaningful opportunity, and a minimum
- 10 of fifteen days, for the noncitizen to seek reopening of their immigration
- 11 proceedings.
- 12

13 *Id.*

14 30. DHS’s own third-country removal policy in effect at the time paled in comparison
15 to these statutorily and constitutionally necessary protections. On March 30, 2025, DHS issued
16 “Guidance Regarding Third Country Removals” that “clarifie[d] DHS policy regarding the removal
17 of aliens with final orders of removal . . . to countries other than those designated for removal in . .
18 . removal orders (third country removals).” Exhibit I, March 30, 2025, Third Country Removals
19 Memorandum, at 2. If DHS secures acceptance of a non-citizen’s deportation to a third country by
20 that country, DHS will inform the detainee of removal to that country, but “Immigration officers
21 will not affirmatively ask whether the alien is afraid of being removed to that country.” *Id.* at 2. If
22 the “alien affirmatively states a fear, USCIS will . . . screen the alien within 24 hours of referral.”
23 *Id.* In that scenario, “USCIS will determine whether the alien would more likely than not be
24 persecuted on a statutorily protected ground or tortured in the country of removal.” *Id.* “If USCIS
25 determines that the alien has not met this standard, the alien will be removed.” *Id.*

26 31. Thereafter, the Government failed to comply with the *D.V.D.* district court’s orders
27 at multiple points while the TRO and preliminary injunction were in place. On March 31, 2025, at
28 least six *D.V.D.* class members were removed from Guantanamo to El Salvador on a Department

1 of Defense plane, in violation of the TRO. *See D.V.D. v. DHS*, No. 1:25-cv-10676- BEM (D. Mass.
 2 Apr. 30, 2025), ECF No. 86. On May 7, 2025, the government attempted to deport a flight of class
 3 members to Libya without compliance with the preliminary injunction, leading to an emergency
 4 TRO motion. *See D.V.D. v. DHS*, No. 1:25-cv-10676-BEM (D. Mass. May 7, 2025), ECF No. 91.
 5 On May 20, 2025, while the government was again in the process of removing class members in
 6 violation of the preliminary injunction (this time to South Sudan), the plaintiffs moved for another
 7 emergency TRO, leading the district court order that the government to retain custody of the class
 8 members and provide the preliminary injunction's protections. *See D.V.D. v. DHS*, No. 1:25-
 9 cv10676-BEM (D. Mass. May 20, 2025), ECF No. 116. On or around June 1, 2025, the
 10 Government deported a group of six individuals to third-country South Sudan without affording
 11 mandatory protections. *See Dep't of Homeland Sec. v. D.V.D.*, 145 S. Ct. 2153 (2025) (Sotomayor,
 12 J., dissenting) ("In matters of life and death, it is best to proceed with caution. In this case, the
 13 Government took the opposite approach . . . in clear violation of a court order, it deported six more
 14 to South Sudan, a nation the State Department considers too unsafe for all but its most critical
 15 personnel."). On June 23, 2025, the Supreme Court issued a summary order that did not provide
 16 reasoning, but granted the Government's request to stay the district court's preliminary injunction
 17 in *D.V.D.* *See DHS v. D.V.D.*, No. 24A1153, 2025 WL 1732103 (U.S. June 23, 2025).

18 32. On May 16, 2025, in another case, the Supreme Court considered the Government's
 19 attempt to remove two Venezuelan nationals who were alleged members of a designated foreign
 20 terrorist organization on a day's notice. *See A. A. R. P. v. Trump*, 145 S. Ct. 1364, 1368 (2025).
 21 There, the Supreme Court held: "notice roughly 24 hours before removal, devoid of information
 22 about how to exercise due process rights to contest that removal, surely does not pass muster." *Id.*

23 33. Nevertheless, DHS felt emboldened by the Supreme Court's stay of the injunction
 24 in *D.V.D.* and adopted a third country removal policy that clearly runs afoul of mandatory statutory
 25 and constitutional protections and the Supreme Court's views in *A. A. R. P.* On July 9, 2025, ICE's
 26 Acting Director Todd Lyons issued a policy memorandum that states some non-citizens will be
 27 deported to third countries with literally no notice whatsoever: "If the United States has received
 28 diplomatic assurances from the country of removal that aliens removed from the United States will

1 not be persecuted or tortured, and if the Department of State believes those assurances to be
2 credible, the alien may be removed without the need for further procedures.” Exhibit H, July 9,
3 2025, Third Country Removal Memorandum issued by acting Director Todd Lyons of ICE.
4 Otherwise, ICE’s new standard procedure is:

- 5 • serve a notice of removal on the detainee—not their counsel if they have any;
- 6 • do not affirmatively ask whether the non-citizen is afraid of being removed to the third
7 country;
- 8 • if the non-citizen was “provided reasonable means and opportunity to speak with an
9 attorney,” then remove them to the third country in as few as 6 hours after serving the notice
10 of removal;
- 11 • if the non-citizen does not affirmatively state a fear of persecution or torture, regardless of
12 whether they had the opportunity to speak to counsel, then remove them in as few as 24
13 hours after serving the notice of removal;
- 14 • if the non-citizen does affirmatively state a fear if removed to the third country, USCIS will
15 screen the non-citizen within 24 hours and unless the non-citizen—again without any
16 mention of counsel—fails to establish they “would more likely than not be persecuted on a
17 statutorily protected ground or tortured in the country of removal,” remove them as soon as
18 possible;
- 19 • only if a non-citizen affirmatively states a fear of removal to a third country and then on
20 less than 24 hours-notice establish they are more likely than not to be persecuted or tortured
21 upon removal will USCIS refer the matter to immigration court for further proceeding, or
22 “[a]lternatively, ICE may choose to designate another country for removal”
23

24 *Id.*

25 34. Independent of the now-stayed *D.V.D.* injunction, an increasing number of courts
26 across the country and in this Circuit have enjoined the Government from effectuating unlawful
27 third-country removals without adhering to mandatory statutory and constitutional protections. *See*
28

1 e.g., *Phan v. Beccerra*, No. 2:25-CV-01757-DC-JDP, 2025 WL 1993735, at *7 (E.D. Cal. July 16,
 2 2025) (granting TRO and preliminary injunction enjoining removal of “Petitioner to a third country
 3 without notice and an opportunity to be heard”); *Y.T.D. v. Andrews*, No. 1:25-CV-01100 JLT SKO,
 4 2025 WL 2675760, at *10 (E.D. Cal. Sept. 18, 2025) (same); *Khan v. Noem*, No. 1:25-CV-01411-
 5 EPG-HC, 2025 WL 3089352, at *9 (E.D. Cal. Nov. 5, 2025) (same); see also *Vaskanyan v. Janecka*,
 6 No. 5:25-cv-01475-MRA-AS, 2025 WL 2014208, at *6–9 (C.D. Cal. June, 25, 2025) (holding
 7 “Petitioner’s removal to a third country without due process . . . is likely to result in irreparable
 8 harm” and enjoining Petitioner’s removal to a third country without the same protections mandated
 9 in the D.V.D. injunction); *J.R. v. Bostock*, No. 2:25-CV-01161- JNW, 2025 WL 1810210, at *4
 10 (W.D. Wash. June 30, 2025) (granting TRO enjoining Government from removing petitioner to
 11 “any third country in the world absent prior approval from this Court”); *Nguyen v. Scott*, No. 2:25-
 12 CV-01398, 2025 WL 2097979, at *3 (W.D. Wash. July 25, 2025) (same); *Misirbekov v. Venegas*,
 13 No. 1:25-CV-00168, 2025 WL 2201470, at *2 (S.D. Tex. Aug. 1, 2025) (granting TRO barring
 14 Government “from transferring, relocating, or removing Petitioner outside the Southern District of
 15 Texas without an Order from the Court”); *Gomez v. Chestnut*, No. 2:25-CV-00975-GMN-BNW,
 16 2025 WL 1695359, at *4 (D. Nev. June 17, 2025) (ordering Government “shall provide 72-hours’
 17 notice to Petitioner’s counsel before it is the Government’s intent to remove Petitioner out of the
 18 country”). Courts in this District have found that “providing Petitioner the time and opportunity to
 19 file a discretionary motion to reopen his immigration proceedings” is insufficient to protect due
 20 process and have instead ordered that a neutral adjudicator (an immigration judge) adjudicate the
 21 petitioner’s fear-based claims. *A.A.M. v. Andrews*, No. 1:25-CV-01514-DC-DMC (HC), 2025 WL
 22 3485219, at *11 (E.D. Cal. Dec. 4, 2025).

23 35. Separately, *Franco-Gonzalez* class members are entitled to additional procedures
 24 and safeguards to ensure due process, including representation by a Qualified Representative (“QR”) and notice to that QR in the event of release or removal. See *Franco-Gonzalez v. Holder*, No. CV-
 25 10-02211, 2014 WL 5475097 (C.D. Cal. Oct. 29, 2014). Specifically, ICE’s directives require that
 26 Field Office Directors:
 27
 28

1 “Authorize advance notice of at least 72 hours to attorneys of record, legal
2 representatives, and/or QRs regarding the release or removal of individuals with
3 serious mental disorders or conditions and/or who are determined to be incompetent
by an IJ in order to facilitate the continuity of representation and/or enable safe release
and/or repatriation.”¹

4 36. This Court should join a host of other recent courts in enjoining Respondents from
5 circumventing the Court’s jurisdiction, INS regulations, and due process by removing Mr. Escobar
6 to a third country without mandatory protections. *See, e.g., Vaskanyan v. Janecka*, No. 5:25-CV-
7 01475-MRA-AS, 2025 WL 2014208, at *6 (C.D. Cal. June 25, 2025) (holding “third-country
8 removals are subject to the same mandatory protections that exist in removal or withholding-only
9 proceedings”).

10 **CLAIMS FOR RELIEF**

11 **COUNT ONE**

12 **Violation of Fifth Amendment Right to Due Process**

13 37. The allegations in the above paragraphs are realleged and incorporated herein.

14 38. The Due Process Clause of the Fifth Amendment to the U.S. Constitution prohibits
15 the federal government from depriving any person of “life, liberty, or property, without due process
16 of law.” U.S. CONST. AMEND. V. Due process protects “all ‘persons’ within the United States,
17 including [non-citizens], whether their presence here is lawful, unlawful, temporary, or permanent.”
18 *Zadvydas*, 533 U.S. at 693.

19 39. For these reasons, Petitioner’s removal to a third country without notice or an
20 opportunity to be heard violates the Due Process Clause of the Fifth Amendment.

21 **PRAYER FOR RELIEF**

22 WHEREFORE, Petitioner respectfully requests this Court to grant the following:

- 23 (1) Assume jurisdiction over this matter;
24 (2) Issue an Order to Show Cause ordering Respondents to show cause why this Petition
25 should not be granted within three days;
26

27
28 ¹ Exhibit F, ICE Directive 11063.2 (Apr. 5, 2022) at p. 1.

- 1 (3) Declare that Petitioner's removal to a third country without notice or an opportunity to
2 be heard action violates the Due Process Clause of the Fifth Amendment;
- 3 (4) Issue a Writ of Habeas Corpus prohibiting Respondents from removing Petitioner via a
4 third-country deportation without allowing Petitioner a meaningful opportunity to be
5 heard on his fear-based claim before an immigration judge in compliance with due
6 process.
- 7 (5) In the alternative, issue a Writ of Habeas Corpus prohibiting Respondents from
8 removing Petitioner via a third-country deportation without providing him and his
9 counsel with meaningful notice and opportunity to assert a fear-based claim by:
- 10 a. providing a minimum of ten (10) days to raise a fear-based claim for protection
11 prior to removal;
- 12 b. moving to reopen Petitioner's removal proceedings if Petitioner demonstrates
13 reasonable fear of removal to the third country;
- 14 c. providing Petitioner a meaningful opportunity, and a minimum of fifteen (15) days
15 for Petitioner to seek reopening of his immigration proceedings if Petitioner is not
16 found to have demonstrated a reasonable fear of removal to the third country.
- 17 (6) Award Petitioner attorney's fees and costs under the Equal Access to Justice Act, and on
18 any other basis justified under law; and
- 19 (7) Grant any further relief this Court deems just and proper.
- 20

21 Dated: December 30, 2025

22 Respectfully Submitted,
23 /s/ Lya Ferreyra
24 Lya Ferreyra

25 *Attorney for Petitioner*
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27
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VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I represent Petitioner, Johnny Alexander Escobar, and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated: December 30, 2025

Respectfully Submitted,

/s/ Lya Ferreyra

Lya Ferreyra

Attorney for Petitioner