

1 Gurpreet Kaur, Esq.
2 Law Office of Gurpreet Kaur
3 674 County Square Dr, Suite 305
4 P.O. Box 2022
5 Ventura, CA 93003
6 Ph. 805-300-9003; Cell 909-997-4570
7 Fax: 805-716-6100
8 E-mail: gurpreetkauresq@gmail.com
9 *Attorney for Petitioner*

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

SUKHWINDER SINGH

Petitioner,
v.

MARK BOWEN, Acting-Warden of the Adelanto
Detention Center; TODD LYONS, Acting
Director of Immigration and Customs
Enforcement; KRISTI NOEM, Secretary of the
U.S. Department of Homeland Security; PAMELA
BONDI, Attorney General of the United States

Respondents.

Civil Action No 5:25-cv-03381-MRA-E

**NOTICE OF SUPPLEMENTAL
AUTHORITY**

NOTICE OF SUPPLEMENTAL AUTHORITY

RE: Entry of Final Judgment in *Bautista v. Santacruz* (C.D. Cal.)

1 Petitioner respectfully submits this Notice of Supplemental Authority to inform the Court of a
2 dispositive legal development directly affecting the issues presented in this habeas action.

3 4 **I. SUPPLEMENTAL AUTHORITY**

5 On December 18, 2025, the United States District Court for the Central District of California entered
6 Final Judgment in the nationwide class action *Maldonado Bautista v. Santacruz*, resolving Counts I–III
7 on the merits and certifying the class. The court declared DHS’s July 8, 2025 detention policy unlawful,
8 holding that noncitizens in pre-final-order removal proceedings who entered without inspection are
9 detained, if at all, under 8 U.S.C. § 1226(a) and are therefore entitled to an individualized bond hearing.

10 11 **II. THE FINAL JUDGMENT IS DISPOSITIVE FOR THREE INDEPENDENT REASONS**

12 **1. Finality and Preclusion**

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14 The *Bautista* court expressly rejected the Government’s argument that class certification and relief were
15 interlocutory and instead entered Final Judgment. As a result, the class determination and merits rulings
16 are final and binding. Because Petitioner falls within the certified class, Petitioner’s detention status has
17 already been adjudicated, and Respondents are collaterally estopped from relitigating the legality of
18 detention under § 1225(b) in this proceeding.

19 20 **2. Administrative Exhaustion Is Futile**

21 The *Bautista* court entered Final Judgment after finding it “troubling” that the Department of Justice
22 issued internal guidance instructing Immigration Judges to disregard the federal court’s prior orders and
23 to “hold the position that Yajure-Hurtado remains good law.” This judicial finding confirms that
24 administrative remedies are not only inadequate but futile, as the agency has prejudged the issue in bad
25 faith and has directed adjudicators to ignore controlling federal court authority.

26 27 **3. Matter of Yajure-Hurtado Is No Longer Tenable**

1 The Final Judgment explicitly held that “the core holding of *Yajure-Hurtado* cannot be squared with the
2 Court’s Order” and that the legal conclusion underlying that decision is “no longer tenable.”
3 Accordingly, Respondents may no longer rely on *Yajure-Hurtado* to justify mandatory detention or to
4 deny Immigration Judges bond authority.

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6 **III. REQUEST FOR RELIEF**

7 Petitioner respectfully requests that this Court:

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1. Take judicial notice of the Final Judgment entered in *Maldonado Bautista v. Santacruz*; and
 2. Grant the Petition for Writ of Habeas Corpus to enforce Petitioner’s established statutory and constitutional rights against the local custodian, including release or, at minimum, a prompt individualized bond hearing under 8 U.S.C. § 1226(a).

14 Respectfully,

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Gurpreet Kaur, Esq.
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17 674 County Square Dr, Suite 305
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18 Ventura, CA 93003
Ph. 805-300-9003; Cell 909-997-4570
19 Fax: 805-716-6100
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