
**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

Heidy Samantha CORAL LOJA

**PETITIONER'S RESPONSE TO
NOTICE TO THE COURT
REGARDING THE PETITION FOR
WRIT OF HABEAS CORPUS {ECF#4}**

Petitioner

Case No: 3:26-CV-000095-KC

v.

Kristi NOEM et al.,

Respondents.

Petitioner, Heidy Samantha Coral Loja, through her attorneys Terja Bouvin Larsen and Brendan K McBride, files this Response to the Government Notice to the Court Regarding Petitioner's Release. As noted in the Respondents' Notice submitted on January 27, 2026, the Petitioner was released on January 22, 2026, and therefore, the relief Miss Coral Loja seeks in her Petition is moot.

However, Attorneys for the Petitioner want to emphasize that Miss Coral Loja, an 18-year-old college student, was unlawfully arrested by ICE officers on her way to school. During the arrest, Miss Coral Loja tried to explain to the ICE officer that she was lawfully present in the United States because she had deferred action and employment authorization, but the ICE officer simply refused to look at her documents and took her into custody.

Miss Coral Loja was detained in Minnesota on January 14, 2026, and transferred to El Paso, Texas, the same day, where she remained unlawfully detained until January 22, 2026. For nine days, she was separated from her mother, who suffers from stage IV breast

cancer, her studies and employment were interrupted, and she was subjected to poor confinement conditions. During her stay at El Paso Camp East Montana ICE detention facility, Miss Coral Loja was not provided with the medication for her thyroid; she was without her needed eyeglasses; and she stayed with about 40 people in a room where the lights did not completely shut off at night and where the noise and smell was unbearable. Miss Coral Loja had to wear the same pants for days, and although she was provided with underwear, t-shirts and socks, those clothes were previously worn by other people, including her underwear.

Miss Coral Loja was abducted by ICE agents in Minnesota and transferred to Texas, as many other noncitizens who are lawfully present in the United States. Miss Coral Loja was caught during an operation that has no legal or moral purpose, and that is costing billions of dollars to taxpayers.

Worse still, Miss Coral Loja was released on January 22, 2026, to a shelter in Texas, where she had no family or support network that could take care of her. Upon release, ICE officers took Miss Coral Loja's social security card and employment authorization card, which, as of today, have not been returned to her. Miss Coral Loja's family had to pay for the Petitioner's travel expenses to return to Minnesota.

The Petitioner's detention and transfer to Texas were entirely unnecessary from any reasonable, decent perspective. Miss Coral Loja is lawfully present in the United States, and she had an agreement with the Government not to be a target for arrest or removal for the duration of her deferred action.

The other relief Petitioner requests to the Court -and anyone else who still believes in the importance of the rule of law – is that as the justice system deals with the aftermath

of a campaign of terror and cruelty that has unnecessarily wasted an enormous amount of public resources, including the time and effort of the Court and its staff, that the Court simply remember Heidi.

Date: 01/28/2026

Respectfully Submitted:

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