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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION

MATILDE SANTIAGO-SAN JUAN,

Petitioner,

v.

KRISTI NOEM, in her official capacity as
Secretary of the Department of Homeland
Security; **PAMELA BONDI**, in her official
capacity as Attorney General of the United
States; **TODD LYONS**, in his official
capacity as Acting Director and Senior
Official Performing the Duties of the
Director of U.S. Immigration and Customs
Enforcement; **SYLVESTER ORTEGA**, in his
official capacity as Field Office Director of the
Laredo Field Office of U.S. Immigration
and Customs Enforcement, Enforcement and
Removal Operations; **JOSE RODRIGUEZ JR.**,
in his official capacity as Warden of the
Dilley Immigration Processing Center.,

Respondents.

Case No. _____

**MOTION FOR TEMPORARY
RESTRAINING ORDER**

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INTRODUCTION

Petitioner, Matilde Santiago-San Juan, is a mother of three U.S. citizen children, and a citizen of Mexico who has lived in the United States for more than twenty-three (23) years, building her family, home, and livelihood here. She has pursued her claims for relief diligently and in good faith, including an application for Cancellation of Removal under INA § 240A(b). Petitioner has no criminal history, no record of violent conduct, and has complied with every requirement imposed by the Department of Homeland Security (DHS) and the immigration court.

On December 1, 2025, DHS apprehended Petitioner in Sebring, Florida, following a traffic stop for driving without a license, and subsequently transferred her to Dilley Immigration Processing Center in Dilley, Texas, where she remains detained under the supervision of the San Antonio Field Office of Enforcement and Removal Operations. Through counsel, Petitioner requested a custody redetermination under section 236 of the Immigration and Nationality Act (INA), relying on the fact that DHS issued her a Form I-200 Warrant of Arrest and placed her in ordinary § 240 removal proceedings.

On December 11, 2025, however, the Immigration Judge denied jurisdiction to consider bond, relying solely on *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025), and concluding that the Court lacked authority to conduct a custody redetermination. Petitioner contested this characterization, explaining that DHS's reliance on *Yajure Hurtado* is legally insufficient to deprive her of access to a bond hearing, particularly in light of the declaratory judgment issued in *Maldonado Bautista v. Santacruz*.

On or about December 20, 2025, Petitioner again requested a custody redetermination based on her membership in the Bond Eligible Class certified in *Maldonado Bautista*. However, once again the Immigration Judge denied jurisdiction to consider bond after Immigration Judges have informed class members in bond hearings that they have been instructed by “leadership” that the declaratory judgment in *Maldonado Bautista* is not controlling, even with respect to class members, and that instead IJs remain bound to follow the agency’s prior decision in *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025).

Despite this, DHS continues to detain Petitioner indefinitely and has refused to provide her with any individualized custody determination. Her removal proceedings remain pending before the Immigration Court, with further hearings forthcoming. Yet no statutory, constitutional, or regulatory basis exists for her continued confinement. Her detention—civil in name but punitive in effect—has become arbitrary, indefinite, and wholly unsupported by any individualized finding of flight risk or danger.

Petitioner suffers irreparable harm each day she remains detained, including prolonged separation from her U.S. citizen children, emotional and psychological harm to her family, and the severe hardship associated with the continued detention of a primary caregiver. The government’s refusal to provide her with a meaningful custody review contravenes the Immigration and Nationality Act, 8 U.S.C. § 1226(a), the Due Process Clause of the Fifth Amendment, and the *Accardi* doctrine, and fundamental constitutional protections governing civil detention. She therefore seeks immediate judicial intervention.

For these reasons, Petitioner respectfully requests that this Court: (1) enjoin Respondents from transferring her outside this District while this action is pending; (2) direct Respondents to provide her with a constitutionally adequate bond hearing before a neutral

Immigration Judge within three (3) days, at which DHS bears the burden of proof; and (3) grant such other and further relief as law and justice require.

STATEMENT OF FACTS

Petitioner repeats and incorporates by reference each Statement of Facts contained in the Petition for Writ of Habeas Corpus as if fully set forth herein.

I. HABEAS RELIEF

To obtain *habeas corpus* relief, a petitioner must demonstrate that he is “in custody in violation of the Constitution or laws or treaties of the United States.” See 28 U.S.C. § 2241(c)(3). This Court has *habeas corpus* jurisdiction to consider the statutory and constitutional grounds for immigration detention that are unrelated to a final order of removal. See *Demore v. Kim*, 538 U.S. 510, 517–18 (2003).

II. DETENTION AUTHORITY UNDER THE INA

The Immigration and Nationality Act (“INA”) establishes three principal statutory bases for the detention of noncitizens in removal proceedings. First, 8 U.S.C. § 1226(a) authorizes the discretionary detention of noncitizens placed in standard removal proceedings under 8 U.S.C. § 1229a. Individuals detained under § 1226(a) are entitled to an individualized custody determination before an Immigration Judge and may seek release on bond or conditional parole. See 8 C.F.R. §§ 1003.19(a), 1236.1(d). By contrast, noncitizens falling within certain enumerated criminal categories are subject to mandatory detention under § 1226(c).

Second, the INA authorizes mandatory detention of certain arriving or recently arrived noncitizens placed in expedited removal or other admission-related proceedings under 8 U.S.C. §

1225(b). Individuals encountered at or near the border are deemed “applicants for admission,” 8 U.S.C. § 1225(a)(1), and must demonstrate that they are “clearly and beyond a doubt” entitled to be admitted. *Id.* § 1225(b)(2)(A). Those who cannot make such a showing “shall be detained,” pending resolution of their cases, unless temporarily paroled under § 1182(d)(5)(A).

Third, individuals subject to a final order of removal fall under the post-order detention scheme set forth in 8 U.S.C. § 1231(a)–(b), which authorizes detention only for a period reasonably necessary to effectuate removal. Sections 1226(a) and 1225(b)(2) were enacted through the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (“IIRIRA”), while § 1226(c) was most recently amended by the Laken Riley Act in 2025.

Under this statutory framework, Petitioner’s custody arises under § 1226(a). **She** is in standard § 240 removal proceedings before the Immigration Court, has no criminal history, and is not subject to any final order of removal. DHS issued her a Form I-200 Warrant of Arrest, placing her squarely within the discretionary custody authority of § 1226(a), not mandatory detention. Nothing in § 1226(a) authorizes prolonged or indefinite detention of a noncitizen who poses no danger or flight risk; civil detention must remain reasonably related to the government’s limited purposes of ensuring appearance and protecting public safety. See *Jennings v. Rodriguez*, 138 S. Ct. 830 (2018); *Demore v. Kim*, 538 U.S. 510, 528–31 (2003).

Despite this statutory scheme, DHS has invoked the Board of Immigration Appeals’ decision in *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025), to argue that Immigration Judges lack jurisdiction to conduct bond hearings for individuals whom DHS asserts were apprehended “shortly after entry.” Relying on that interpretation, the Immigration Judge declined to hear Petitioner’s bond request, despite her placement in § 240 proceedings, service of a

Form I-200 warrant, and her eligibility for custody redetermination under 8 C.F.R. §§ 1003.19(a), 1236.1(d).

This position effectively deprives Petitioner—and similarly situated individuals—of the statutory and regulatory protections that Congress and the Executive have long provided to noncitizens in § 240 proceedings. It results in prolonged detention with no individualized assessment of necessity, contrary to the INA’s structure and purpose, and inconsistent with constitutional limits on civil confinement. Accordingly, Petitioner’s continued detention falls outside the narrow detention authority conferred by the INA, which requires individualized custody review and prohibits arbitrary or indefinite detention—protections that Petitioner has been categorically denied.

STANDARD OF REVIEW

Temporary restraining orders and preliminary injunctions are evaluated under the same standard in federal courts within the Fifth Circuit. Under the framework established by the Supreme Court in *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 20 (2008), a movant must demonstrate a likelihood of success on the merits, a likelihood of suffering irreparable harm in the absence of preliminary relief, that the balance of equities tips in the movant’s favor, and that an injunction is in the public interest. See also *Valley v. Rapides Parish School Bd.*, 118 F.3d 1047, 1051 (5th Cir. 1997) (reciting the same four-factor test). A TRO is warranted where, as here, the petitioner faces ongoing constitutional violations and unlawful detention that threaten immediate, irreparable injury for which no adequate remedy exists at law.

ARGUMENTS

I. PETITIONER HAS ESTABLISHED A LIKELIHOOD OF SUCCESS ON THE STATUTORY DETENTION.

A. Petitioner's Prolonged Detention Without Bond Hearing Is Unlawful Under the INA.

The Immigration and Nationality Act ("INA") authorizes civil immigration detention only when it serves a legitimate statutory purpose: ensuring appearance at future proceedings or protecting public safety. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001); *Clark v. Martinez*, 543 U.S. 371, 381 (2005). When detention ceases to advance those purposes or becomes arbitrary or indefinite, it exceeds the government's statutory authority.

Petitioner has now been detained for several months without any individualized determination regarding the necessity of her confinement. She was served with a Form I-200 arrest warrant and placed in standard § 240 removal proceedings, making her detention subject to the discretionary framework of 8 U.S.C. § 1226(a). Petitioner has no criminal history, does not pose a danger to the community, and has consistently complied with the requirements imposed by DHS and the Immigration Court. Despite these facts, she has been denied access to a bond hearing before a neutral adjudicator and remains confined at Dilley Immigration Processing Center in Dilley, Texas.

This prolonged detention violates not only the INA's limits on civil confinement but also the declaratory judgment issued in *Maldonado Bautista v. Santacruz*, which held that class members like Petitioner are detained under § 1226(a) and may not be denied consideration for release on bond. Yet DHS and EOIR have refused to recognize Petitioner's statutory right to a bond hearing, thereby placing her outside the detention authority authorized by Congress.

Because Petitioner's detention no longer serves any legitimate governmental interest and directly contravenes binding judicial authority, it has become arbitrary, excessive, and unlawful under the INA.

B. DHS's Reliance on a Jurisdictional Technicality Has Deprived Petitioner of a Custody Review Mechanism.

DHS asserts that Petitioner is subject to mandatory detention under § 1225(b) of the INA based on disputed allegations that he was apprehended "shortly after entry." That assertion is contradicted by the government's own actions: Petitioner was served with a Form I-200 Warrant for Arrest and placed in § 240 removal proceedings, which are governed by § 1226(a). Under these circumstances, jurisdiction over the bond lies with the Immigration Judge. See 8 C.F.R. §§ 1003.19(a), 1236.1(d).

Nevertheless, on December 11, 2025, the Immigration Judge declined jurisdiction based solely on *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025), which DHS invoked to reclassify Petitioner as an "arriving alien." This categorical approach—grounded entirely in DHS's untested characterization of her apprehension—has deprived Petitioner of any mechanism to seek release. She cannot request a bond hearing before the Immigration Judge, and DHS has declined to consider parole or other discretionary custody options.

This bureaucratic reclassification has placed Petitioner in administrative limbo: she is treated as an "arriving alien" for detention purposes but as a § 240 respondent for removal purposes. The statute does not authorize DHS to deny her access to a custody review process by manipulating jurisdictional labels. This misclassification is contrary to the INA, the governing regulations, and established precedent requiring individualized assessments of custody.

C. Continued Detention Violates Petitioner's Fifth Amendment Right to Due Process

The Fifth Amendment guarantees that no person shall be deprived of liberty without due process of law, a protection that extends to all persons within the United States, regardless of immigration status. *Zadvydas*, 533 U.S. at 693; *Landon v. Plasencia*, 459 U.S. 21, 32 (1982). Petitioner's prolonged detention—without a bond hearing, without individualized assessment, and based solely on a disputed jurisdictional classification—violates these core constitutional protections.

The Supreme Court has emphasized that “[f]reedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that [the Due Process] Clause protects.” *Zadvydas*, 533 U.S. at 690 (quoting *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992)). Applying the three-part balancing test of *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976), Petitioner's due process claim easily prevails. First, the private interest at stake—freedom from physical confinement—is among the most fundamental recognized in constitutional law.

Second, the risk of erroneous deprivation is extraordinarily high given DHS's unilateral reclassification and the Immigration Judge's refusal to evaluate Petitioner's actual danger or flight-risk profile. Third, the government's interest in maintaining custody is minimal here, as Petitioner has no criminal history, is a single mother of three United States citizen children, has substantial community ties developed over more than two decades in the United States, and has complied with every requirement imposed upon her. Because the government has provided no constitutionally adequate procedure to review the lawfulness or necessity of Petitioner's detention, her continued confinement violates the Due Process Clause. At a minimum, due process requires

a prompt bond hearing before a neutral adjudicator at which DHS bears the burden of establishing, by clear and convincing evidence, that continued detention is necessary.

II. PETITIONER WILL SUFFER IRREPARABLE HARM UNLESS THE COURT ISSUES A TEMPORARY RESTRAINING ORDER.

Under *Winter v. Natural Resources Defense Council*, 555 U.S. 7 (2008), Petitioner must demonstrate that he will suffer irreparable harm in the absence of immediate injunctive relief. In the immigration detention context, courts have consistently recognized that ongoing, unlawful deprivation of physical liberty constitutes irreparable harm as a matter of law. See *Rodriguez v. Robbins*, 804 F.3d 1060, 1080–81 (9th Cir. 2015), rev'd on other grounds sub nom. *Jennings v. Rodriguez*, 138 S. Ct. 830 (2018); *R.I.L.-R v. Johnson*, 80 F. Supp. 3d 164, 191 (D.D.C. 2015) (“the deprivation of physical liberty for even one day constitutes irreparable harm”). Petitioner’s continued confinement—despite the absence of any individualized custody review—inflicts exactly the sort of harm that the *Winter* standard contemplates.

Petitioner has been detained for several months at Dilley Immigration Processing Center; a secure civil detention facility whose conditions closely resemble those of a penal institution. She is deprived of freedom of movement, placed under strict institutional control, separated from her U.S. citizen children and family support network, and subjected to continuous monitoring. Every additional day of confinement deepens the constitutional injury she suffers from being denied access to a bond hearing or any meaningful opportunity to challenge the legality of her detention.

Courts have recognized that “[p]rolonged detention without an individualized determination of dangerousness or flight risk inflicts irreparable injury on detainees.” *Sajous v. Decker*, 2018 WL 2357266, at 12 (*S.D.N.Y. May 23, 2018*). The harm here is neither hypothetical

nor remote; it is ongoing, acute, and directly attributable to Respondents' refusal to provide Petitioner with a custody determination. See also *Leal-Hernandez v. Noem*, No. 1:25-cv-02428, 2025 WL 327685, at 37 (*D. Md. Aug. 24, 2025*) (finding irreparable harm where petitioner remained detained without any lawful process or review).

Petitioner's continued incarceration has also caused significant emotional and psychological harm. As a single mother, her prolonged detention has resulted in severe distress stemming from separation from her minor U.S. citizen children, uncertainty regarding their care and well-being, and the stressful, punitive conditions of confinement. Her declaration and supporting records reflect escalating anxiety, depression, insomnia, and fear, injuries that cannot be undone after the fact, nor compensated monetarily. As recognized in similar contexts, "every day of detention is another day of lost liberty that cannot be recovered." *Hernandez v. Sessions*, 872 F.3d 976, 994 (9th Cir. 2017).

The public interest likewise favors immediate intervention. Preventing constitutional violations is always in the public interest. *Melendres v. Arpaio*, 695 F.3d 990, 1002 (9th Cir. 2012). Allowing DHS to continue detaining Petitioner indefinitely without lawful authority or individualized review undermines the integrity of the immigration system and erodes public confidence in the rule of law. Accordingly, Petitioner has demonstrated irreparable harm of the highest order. Immediate judicial intervention is necessary to prevent further unlawful deprivation of liberty and to ensure compliance with the statutory and constitutional safeguards governing civil detention.

III. THE BALANCE OF HARMS WEIGHS IN FAVOR OF PETITIONER

The final two *Winter* factors—the balance of equities and the public interest—strongly favor granting injunctive relief. Where the government is a party, these factors merge. *Nken v. Holder*, 556 U.S. 418, 435 (2009). Together, they require the Court to consider whether the harm to Petitioner from continued detention outweighs any harm to the government arising from his release or from providing a prompt bond hearing, and whether such relief advances or undermines the public interest.

Here, the equities tilt sharply in Petitioner’s favor. Every additional day of confinement inflicts a profound deprivation of liberty and exacerbates the psychological and emotional harm that Petitioner has already suffered during her months-long incarceration at Dilley Immigration Processing Center in Dilley, Texas. Petitioner has no criminal history, poses no danger to the community, and has consistently complied with every requirement imposed by DHS and the Immigration Court. Her continued detention serves no legitimate purpose under the Immigration and Nationality Act (“INA”) and directly contradicts the government’s stated interest in detaining only those who present a genuine risk of flight or public safety threat.

By contrast, the government faces minimal—if any—harm if relief is granted. Releasing Petitioner under reasonable supervision or providing her with a constitutionally adequate bond hearing does not impede any lawful enforcement objective. As courts have observed, “[t]he government suffers no harm when it is required to adhere to the Constitution.” *O’Donnell v. Harris County*, 892 F.3d 147, 155 (5th Cir. 2018). Administrative convenience cannot justify prolonged, unlawful detention that exceeds statutory authority or violates constitutional protections.

The public interest also strongly favors Petitioner. The public has an overriding interest in ensuring that immigration detention is conducted lawfully, in accordance with due process, and only for legitimate statutory purposes. See *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001) (warning

that indefinite civil detention “would raise serious constitutional concerns”); *Beltran v. Smith*, 458 F. Supp. 3d 1139, 1145 (D. Colo. 2020) (ordering release where detention no longer served INA objectives). Upholding constitutional safeguards for individuals in civil immigration custody reinforces the integrity of the justice system and affirms that the government must operate within the bounds of law and necessity.

Balancing these considerations, both the equities and the public interest weigh decisively in favor of Petitioner’s release or, at minimum, a prompt bond hearing before a neutral adjudicator. Granting relief will prevent further irreparable harm to Petitioner and promote the public’s compelling interest in ensuring that the government complies with statutory and constitutional constraints governing civil detention.

CONCLUSION

For the reasons set forth above, Petitioner Matilde Santiago-San Juan has demonstrated a clear likelihood of success on the merits of her claims, will suffer irreparable harm in the absence of immediate relief, and has shown that the balance of equities and the public interest overwhelmingly favor granting a temporary restraining order. Her continued detention—without a bond hearing, an individualized custody determination, or any meaningful judicial review—violates the Immigration and Nationality Act and the Due Process Clause of the Fifth Amendment.:

Accordingly, Petitioner respectfully requests that this Honorable Court:

1. Enjoin Respondents and their agents from transferring Petitioner outside the jurisdiction of this Court while this matter is pending;

2. Direct Respondents to provide her with a constitutionally adequate bond hearing before a neutral Immigration Judge within three (3) days, at which the government bears the burden of proving, by clear and convincing evidence, that continued detention is necessary; and
3. Grant such other and further relief as the Court deems just and proper.

Dated: January 31, 2026

Respectfully Submitted,

/S/ Halimatou Bah

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VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I represent Petitioner, MATILDE SANTIAGO-SAN JUAN, and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Petition for TRO are true and correct to the best of my knowledge.

Dated: January 31, 2026

Respectfully Submitted,

/S/ Halimatou Bah

Halimatou Bah

CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2026, I filed the foregoing petition for TRO electronically through the CM/ECF system, which caused all parties or counsel to be served by electronic means as more fully reflected on the Notice of Electronic Filing.

Dated: January 31, 2026

Respectfully Submitted,

/S/ Halimatou Bah

Halimatou Bah