Spencer Judd Jr., Esq.
NV Bar# 14219
SJ Law
720 E Charleston Blvd., Ste. 165
Las Vegas, NV 89104
Phone: (702) 572-5939
immigration@SJLaw.vegas

*Counsel for Petitioner*

**IN THE UNITED STATES DISTRICT COURT**
**FOR THE DISTRICT OF NEVADA**

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| Juan GARCIA DEHUMA,<br>*Petitioner*,<br><br>v.<br><br>Jason KNIGHT, Field Office Director, Salt Lake City Field Office, U.S. Immigration and Custom Enforcement, Enforcement and Removal Operations Division;<br><br>John MATTOS, Warden, Nevada Southern Detention Center;<br><br>Kristi NOEM, Secretary, United States Department of Homeland Security;<br><br>Pamela BONDI, Attorney General of the United States,<br>*Respondents*. | Case No. 2:26-cv-00455-RFB-EJY<br><br>**PETITIONER'S REPLY IN SUPPORT OF WRIT OF HABEAS CORPUS PURSUANT TO 28 U.S.C. § 2241 AND MOTION FOR TEMPORARY RESTRAINING ORDER**<br><br>Judge Richard Boulware |

1. Having received and reviewed Federal Respondents' Response (ECF No. 6), Petitioner Juan Garcia Dehuma files the present reply in support of his Petition for a Writ of Habeas Corpus, 28 U.S.C. § 2241, challenging his unlawful detention by Respondents.

2. As to Respondents' concessions that should this Court continue to follow its own conclusions where non-citizens in similarly situated situations should: (1) properly be considered

to be detained under 8 U.S.C. §1226 and (2) have therefore been either released on bond or, at a minimum, granted the opportunity of receiving a bond determination hearing, Mr. Garcia Dehuma would agree. He also understands that Respondents' position does not amount to an agreement on the merits or a waiver of any of their appellate rights.

3. Petitioner again renews his request that he be ordered released on the same bond amount and conditions upon which he was previously released in July 2025 as soon as possible so as to not spend any more time in custody than he already has.

4. Finally, Mr. Garcia Dehuma is also willing to waive a hearing and resolve this matter with a ruling on the papers but would also be willing to appear in court with or via counsel at the Court's discretion.

Respectfully submitted this 24th day of February 2026.

/s/*Spencer Judd Jr., Esq.*
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Las Vegas, NV 89104
Phone: (702) 572-5939
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*Counsel for Petitioner*