UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

Irving Lugo Colina, Petitioner, v. KEVIN RAYCRAFT, in his official capacity as Field Office Director of Enforcement and Removal Operations, Detroit Field Office, Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary, U.S. Department of Homeland Security; U.S. DEPARTMENT OF HOMELAND SECURITY; Pamela BONDI, in her official capacity as U.S. Attorney General; EXECUTIVE OFFICE FOR IMMIGRATION REVIEW, Respondents.	Case No. 26-cv-784 Hon. **PETITION FOR WRIT OF HABEAS CORPUS AND IMMEDIATE RELEASE BASED ON RESPONDENT'S BOLD-FACE VIOLATION OF STATUTES AND SYSTEMATIC DENIAL OF DUE PROCESS**

INTRODUCTION

1. Petitioner respectfully requests this Honorable Court to issue a writ of habeas corpus **immediately releasing** him from detention. This request is based on three premises: 1) Petitioner's arrest was unlawful, 2) Respondents

lack lawful authority to detain Petitioner, and 3) Respondents have forfeited any deference they would otherwise be owed from a federal court.

2. The "typical remedy" for "unlawful executive detention" is **release** from custody. See *Munaf v. Geren*, 553 U.S. 674, 693 (2008); see also Preiser, 411 U.S. at 484. "[T]he court shall summarily hear and determine the facts, and dispose of the matter as law and justice require." 28 U.S.C. § 2243.

3. First, Petitioner's detention violates the Fifth Amendment's Due Process Clause because Respondents arrested and continue to detain him without providing the most basic procedural safeguards: advance notice of the reasons for detention and a prompt, meaningful opportunity to be heard before a neutral decisionmaker. Detention-first and process-later is not compatible with due process, even in the civil immigration context.

4. Second, while Respondents invoke 8 U.S.C. § 1231 as the statutory basis for holding Petitioner, that statute does not authorize the manner in which they have implemented his detention. During the initial ninety-day removal period, § 1231(a)(2) provides for mandatory detention, but beyond that period, detention becomes discretionary under § 1231(a)(6) and is strictly constrained by Zadvydas v. Davis, 533 U.S. 678 (2001), and by the Due

Process Clause. Respondents have ignored those limits and bypassed the minimal protections that even their own regulations contemplate.

5. Third, Respondents make no pretenses about their intention to continue to deny due process to individuals like Petitioner. This intention is evidenced by:

   - Respondents' broadcasting of their intention of providing non-neutral, biased adjudication for any request brought by Petitioner and others similarly situated before these courts. The recent rebrand of "Immigration Judges" to "Deportation Judges,"[1] is a clear statement to Petitioner and others similarly situated of this intention. Additionally, the public statements by Respondents make this point even more clear. See Exhibits 1 and 2 below.

[1] **See job postings by Respondents stating: "Apply to become a deportation judge,""Apply to become a deportation judge,"** U.S. Dep't of Justice, https://join.justice.gov/ (last visited Feb. 8, 2026); **"Help write the next chapter of America. Apply today to become a deportation judge and define America for generations"** Homeland Security Careers, U.S. Dep't of Homeland Sec., https://www.dhs.gov/homeland-security-careers; "Apply to join the **Department of Justice as a deportation judge**" U.S. Department of Homeland Security, Facebook, https://www.facebook.com/homelandsecurity (official DHS page).



Exhibit 1: Photograph of "tweet" from US Department of Justice's official Twitter/X account, which includes, in part, the line: "Your work will have generational consequences."



Exhibit 2: Photograph of "tweet" from US Department of Homeland Security's official Twitter/X account, which states: "Remember what they did to our country."

- Respondents have also been insidious in their actions. Beginning in early-January 2026, outcomes in bond hearings following grants of habeas relief shifted dramatically. Whereas bond had routinely been granted in such post-habeas cases, particularly where individuals lacked significant criminal history, had strong family and community ties in the United States, had long-term residence, possessed viable claims for relief, and secured stable housing and employment prospects, Deportation Judges[2] have, in the weeks since, begun uniformly denying bond in materially similar circumstances. See Exhibit 3.
- Firing Deportation Judges who do not fall into lockstep with Respondents' policy goals;[3]
- Codifying the wholesale denial of appeals brought to the Board of Immigration Appeals.[4]

6. Without justification, probable cause, or reasonable suspicion of a crime or immigration violation, Petitioner was arrested while attending his

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[2] Expecting an adjudicator titled "deportation judge" to be "neutral" is like expecting the Archbishop of Canterbury to impartially preside over Henry VIII's annulment.

[3] See Ximena Bustillo, *The Trump Administration Fired Nearly 100 Immigration Judges in 2025. What's Next?*, NPR (Jan. 10, 2026), https://www.npr.org/2026/01/10/nx-s1-5672386/the-trump-administration-fired-nearly-100-immigration-judges-in-2025-whats-next.

[4] See Appellate Procedures for the Board of Immigration Appeals, Interim Final Rule,, 90 Fed. Reg. 15,525, 15,525–26 (Apr. 14, 2025) (reducing the BIA to 15 permanent Board members), https://www.govinfo.gov/content/pkg/FR-2025-04-14/pdf/2025-06294.pdf.

immigration appointment. Petitioner is currently detained at the North Lake Processing Center in Baldwin, Michigan, a *privately-owned, for-profit* facility owned and operated by GEO Group Incorporated.

7. The Constitution does not tolerate what would be plainly unlawful in the criminal context simply because the detention is labeled "civil." Nor does the Constitution withhold its protections when a person is an immigrant. These statutory errors reinforce the conclusion that Petitioner's ongoing detention violates the Fifth Amendment and **must end**. See *Mata Velasquez v. Kurzdorfer*, No. 25-CV-493-LJV (W.D.N.Y. July 16, 2025) (where a noncitizen detainee's due process was violated, his detention is unlawful and he must be released).This Court should exercise its equitable power in this case, because the administrative body that could provide relief to Petitioner has already predetermined the issue. See *Shalala v. Ill. Council on Long Term Care, Inc.,* 529 U.S. 1, 13 (2000).

8. Because both the unlawful detention and continued violation of due process render his current detention unconstitutional, the appropriate remedy is immediate release.

JURISDICTION

15. The judicial power of the federal courts extends to "Cases" and "Controversies" that arise under the Constitution and the laws of the United States. U.S. Const. art. III, § 2.

16. Indeed, challenges to present immigration confinement "fall within the 'core' of the writ of habeas corpus." *Trump v. J. G. G.*, 604 U.S. 670, 672 (2025) (quoting Nance v. Ward, 597 U.S. 159, 167 (2022)).

17. This Court may grant relief pursuant to 28 U.S.C. § 2241, the Declaratory Judgment Act, 28 U.S.C. § 2201 et seq., and the All Writs Act, 28 U.S.C. § 1651.

VENUE

17. Venue is proper in the Western District of Michigan under 28 U.S.C. § 2241 and 28 U.S.C. § 1391. Petitioner is detained at the direction, and is in the immediate custody, of Respondent Kevin Raycraft. See *Roman v. Ashcroft*, 340 F.3d 314, 320-21 (6th Cir. 2003).

18. Venue is also properly in this Court pursuant to 28 U.S.C. § 1391(e) because Respondents are employees, officers, and agencies of the United States, and because a substantial part of the events or omissions giving rise to the claims and relevant facts occurred in this District.

REQUIREMENTS OF 28 U.S.C. § 2243

19. Habeas corpus is "perhaps the most important writ known to the constitutional law . . . affording as it does a swift and imperative remedy in all cases of illegal restraint or confinement." *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added). Section 2241 of Title 28 confers the federal courts with the power to issue writs of habeas corpus to persons "in custody in violation of the Constitution or laws or treaties of the United States." 28 U.S.C. § 2241(c)(3); *Torrence v. Lewis*, 60 F.4th 209, 213 (4th Cir. 2023) ("A federal court may grant habeas relief only on the ground that the petitioner is in custody in violation of the Constitution or laws or treaties of the United States." (internal citations and brackets omitted)).

20. After receiving the petition and any response thereto, "[t]he court shall summarily hear and determine the facts, and dispose of the matter as law and justice require." 28 U.S.C. § 2243. The petitioner bears the burden of proving that he is being held contrary to law by a preponderance of the evidence. *Walker v. Johnston*, 312 U.S. 275, 286 (1941).

PARTIES

21. Petitioner is a citizen of Venezuela and resident of Westerville, Ohio . Petitioner has been detained since 12/18/2025.

22. Respondent Kevin Raycraft is the Director of the Detroit Field Office of ICE's Enforcement and Removal Operations division. As such, Director Raycraft is Petitioner's immediate custodian and is responsible for Petitioner's detention and removal. He is named in his official capacity.

23. Respondent Kristi Noem is the Secretary of the Department of Homeland Security. She is responsible for the implementation and enforcement of the INA and oversees ICE, which is responsible for Petitioner's detention. Ms. Noem has ultimate custodial authority over Petitioner and is sued in her official capacity.

24. Respondent Department of Homeland Security (DHS) is the federal agency responsible for implementing and enforcing the INA, including the detention and removal of noncitizens.

25. Respondent Pamela Bondi is the Attorney General of the United States. She is responsible for the Department of Justice, of which the Executive Office for Immigration Review (EOIR) and the immigration system it operates is a component agency. She is sued in her official capacity.

26. Respondent Executive Office for Immigration Review (EOIR) is the federal agency responsible for implementing and enforcing the INA in removal proceedings, including for custody redeterminations in bond hearings.

LEGAL FRAMEWORK

I. RESPONDENTS VIOLATED THE CONSTITUTION AND SEVERAL STATUTES

A. Petitioner's Detention Violates Fifth Amendment's Due Process Clause

21. "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the very liberty that [the Due Process Clause] protects." *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001) (citation omitted). The Fifth Amendment's Due Process Clause extends to all persons, regardless of status. See *A. A. R. P. v. Trump*, 145 S. Ct 1364, 1367 (2025). Thus, noncitizens, such as Petitioner, are entitled to its protections. See *id.*; see also *Chavez-Acosta v. Garland*, No. 22-3045, 2023 WL 246837, at *3 (6th Cir. Jan. 18. 2023).

22. Courts have repeatedly held that where the Government deprives a noncitizen of liberty under § 1231, due process requires at least two minimal safeguards: (1) notice of the reasons for detention or redetention, and (2) a prompt, meaningful opportunity to respond—often in the form of an informal interview or similar process. See, *Diallo v. Joyce*, No. 25-cv-9909 (AS), 2025 WL (S.D.N.Y. Dec. 23, 2025), *Zhu v. Genalo*, 2025 WL 2452352, at *6 (S.D.N.Y. Aug. 26, 2025); *Funes v. Francis*, 2025 WL 3263896, at *21 (S.D.N.Y. Nov. 24, 2025) ; *Ceesay v. Kurzdorfer*, 781 F.

Supp. 3d 137, 157 (W.D.N.Y. 2025). These protections are not exotic; they are the Government's own "normal course" procedures when it revokes release for people on an order of supervision.

23. In *Diallo*, the court held that the Government violated procedural due process by arresting and detaining that petitioner "for no discernable reason," without any notice or opportunity to be heard, and without providing the basic safeguards it offers in other § 1231 redetention contexts. It concluded that her arrest and detention "without following these basic procedures plainly violated her due process rights" and ordered release as the "typical remedy" for unlawful executive detention. No. 25-cv-9909 (AS), 2025 WL (S.D.N.Y. Dec. 23, 2025).

24. The same fundamental defect exists here: Respondents seized and continue to hold Petitioner without affording him any front-end process tailored to the decision to deprive him of his liberty.

25. Under *Mathews v. Eldridge*, 424 U.S. 319 (1976), the Court must consider the following three factors: "(1) the private interest that will be affected by official action; (2) the risk of erroneous deprivation of that interest; and (3) the government's interest, including the fiscal and administrative burdens

that the additional or substitute procedures entail." See *Lopez-Campos*, 2025 WL 2496379, at *9 (citing Mathews, 424 U.S. at 335).

26. The first *Mathews* factor clearly weighs in favor of Petitioner. Here, Petitioner entered the United States at a port of entry, and Respondents granted Petitioner entry into the United States, determining that Petitioner was not a flight risk or danger. Since then, Petitioner has only further established that he is neither a flight risk nor danger. Respondents have now detained Petitioner, and there is no dispute that Petitioner has a significant private interest in avoiding detention, as one of the "most elemental of liberty interests" is to be free from detention. *Hamdi v. Rumsfeld*, 542 U.S. 507, 529 (2004) (citation omitted). Respondents provided none of these basic protections of 1231 before revoking Petitioner's liberty, sharply increasing the risk of an erroneous deprivation.

27. The second *Mathews* factor also weighs in Petitioner's favor. Clearly, there is a high risk of erroneously depriving Petitioner of his freedom if Petitioner does not receive an individualized determination regarding the revocation of his parole. "To mitigate the risk of erroneous deprivation, due process would require, 'at [a] minimum, the opportunity for [Petitioner] to submit evidence relevant to whether [the government] should revoke [his parole] before [it]

make[s] a revocation decision.'" *Mata Velasquez v. Kurzdorfer*, 794 F. Supp. 3d 128, 153 (W.D.N.Y. 2025) (citation omitted). Those interests would not be undercut by minimal procedures as modest as written notice and an informal interview. These same safeguards the Government itself has recognized as appropriate when it redetains other noncitizens pursuant to § 241.4(l). See *Diallo v. Joyce*, No. 25-cv-9909 (AS), 2025 WL (S.D.N.Y. Dec. 23, 2025).

28. Finally, under the third *Mathews* factor, courts recognize that the Government "does, indeed, have a legitimate interest in ensuring noncitizens' appearance at removal proceedings and preventing harms to the community." See *Sampiao v. Hyde*, No. 1:25-cv-11981-JEK, 2025 WL 2607924, at *12 (D. Mass. Sep. 9, 2025) (citation omitted). However, Respondents cannot show that they have a significant interest in this Petitioner's continued detention. Notably, continuing to detain Petitioner will impose more financial and administrative costs upon the Government, as it would be required to continue funding and overseeing Petitioner's detention. See *id.*[5]

[5] In fact, the American taxpayer is footing the bill for Petitioner's continued detention to the tune of millions of dollars a month. *See* U.S. Attorney Moore Capito Announces Success of Major Immigration Operation in West Virginia, Press Release, U.S. Dep't of Justice, U.S. Att'y's Office for the S. Dist. of W. Va. (Jan. 29, 2026), https://www.justice.gov/usao-sdwv/pr/us-attorney-moore-capito-announces-success-major-immigration-operation-west-virginia

29. Further, "[p]erhaps more importantly, such unnecessary detention imposes substantial societal costs," as it "separates families and removes from the community breadwinners, caregivers, parents, siblings and employees." *Hernandez-Lara*, 10 F.4th at 33 (citing, in part, *Velasco Lopez v. Decker*, 978 F.3d 842, 855 (2d Cir. 2020)).

30. Petitioner's constitutional rights combined with the *Mathews* factors make clear that this Court should order him released immediately.

B. Exhaustion Not Necessary

31. A court may choose to rule upon the merits of the issues presented when the "legal question is 'fit' for resolution and delay means hardship." *Shalala v. Ill. Council on Long Term Care, Inc.*, 529 U.S. 1, 13 (2000) (citation omitted). A court may also waive exhaustion if the "pursuit of administrative remedies would be a futile gesture." *Shearson*, 725 F.3d at 594 (citation omitted).

32. Even in situations where a court may ordinarily apply exhaustion, the court may still choose to waive exhaustion. See *Lopez-Campos*, 2025 WL 2496379, at *4 (citations omitted). Here, no applicable statute or rule mandates administrative exhaustion by Petitioner. Thus, whether to require exhaustion is within this Court's "sound judicial discretion." See *Shearson v.*

Holder, 725 F.3d 588, 593–94 (6th Cir. 2013) (quoting *McCarthy v. Madigan*, 503 U.S. 140, 144 (1992)). "Courts have described an implied requirement to raise issues with an agency as a 'judgemade,' 'prudential,' or 'common law' duty to exhaust," *Island Creek Coal Co. v. Bryan*, 937 F.3d 738, 746 (6th Cir. 2019)

33. Respondents' policy issued on July 8, 2025, instructing all employees to no longer apply 8 U.S.C. § 1226(a) to people charged with being inadmissible under § 1182(a)(6)(A)(i) and the precedential decision by the Board of Immigration Appeals (BIA) in *Matter of YAJURE HURTADO*, 29 I & N Dec. 216, issued on September 5, 2025, renders any administrative exhaustion futile.

34. Notably, Respondents updated the procedures for the Board of Immigration Appeals on February 6, 2026. **This update makes summary dismissal of all BIA appeals the default**. It cuts most appeal deadlines to 10 days (retaining 30 days only for certain asylum denials), imposes simultaneous 20-day briefing with no reply briefs and very limited extensions, and streamlines forwarding of the record and internal decision timelines. The rule also removes tools the Chief Appellate Immigration Judge previously

had to delay cases, and rebrands "noncitizen" as "alien" throughout several EOIR regulations.[6]

35. Any attempts at exhaustion by Petitioner are futile and will result in further hardship to Petitioner.

36. The Sixth Circuit has noted that **due process challenges generally do not require exhaustion** because the Board of Immigration Appeals (BIA) cannot review constitutional challenges. See *Sterkaj v. Gonzales*, 439 F.3d 273, 279 (6th Cir. 2006) (discussing that "an alien's due process challenge generally does not require exhaustion," but noting that an "alien must raise correctable procedural errors," such as a claim "that the BIA denied him due process by relying upon an 'incomplete and inaccurate' transcript to review his case," "to the BIA"). Finally, it is doubtful that BIA review of Petitioner's custody would preclude the need for judicial review. The Court reaches that conclusion based upon the fact that the Government has clearly set forth its belief that all noncitizens are subject to mandatory detention during removal proceedings. And, recently the BIA proclaimed that all noncitizens are subject to mandatory detention under § 1231(a)(1)(B)(i)-(iii). See *Matter of Yajure Hurtado*, 29 I&N Dec. 216, 229 (BIA 2025).

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[6]See Appellate Procedures for the Board of Immigration Appeals, Interim Final Rule,, 90 Fed. Reg. 15,525, 15,525–26 (Apr. 14, 2025) (reducing the BIA to 15 permanent Board members), https://www.govinfo.gov/content/pkg/FR-2025-04-14/pdf/2025-06294.pdf.

37. It is **guaranteed** that an appeal to the BIA would not obviate the need for judicial review of Petitioner's § 2241 petition.

38. Because Petitioner's is "in custody in violation of the Constitution or laws of the United States" under 28 U.S.C. § 2241(c)(3), and the appropriate remedy is immediate release from detention.

II. EVEN UNDER 8 U.S.C. § 1231, RESPONDENTS' CONTINUED DETENTION OF PETITIONER IS UNLAWFUL.

A. Petitioner's Parole Was Never Terminated Prior to His Arrest, in Violation of § 18 U.S.C. § 1231.

36. Approximately four (4) ago, Respondents paroled Petitioner into the United States under 8 U.S.C. § 1182(d)(5)(A).

37. Respondents will argue—as they did in Petitioner's prior habeas—that 8 U.S.C. § 1231 governs his detention because he is subject to a reinstated order of removal. In its March 2, 2026 opinion, this Court accepted that position for purposes of the initial ninety-day removal period, holding that Petitioner's removal period began on December 11, 2025 and would expire on March 11, 2026, and that detention during that period is mandatory under § 1231(a)(2).

38. The decision to grant parole pursuant to 8 U.S.C. § 1182(d)(5)(A) is determined "on a case-by-case basis." 8 U.S.C. § 1182(d)(5)(A). Then, "when the purpose of the parole has been served," § 1182(d)(5)(A) provides that "the alien shall forthwith return or be returned to the custody from which he was paroled and thereafter his case shall continue to be dealt with in the same manner as that of any other applicant for admission to the United States." *Jennings*, 583 U.S. at 288 (quoting 8 U.S.C. § 1182(d)(5)(A)).

39. To terminate the previously granted parole, the agency must comply with the applicable regulatory and statutory requirements.

40. 8 C.F.R. § 212.5(e)(2)(i), which governs the "[t]ermination of parole,"

> In cases not covered by paragraph (e)(1) of this section,[1] upon accomplishment of the purpose for which parole was authorized or when in the opinion of one of the officials listed in paragraph (a) of this section, neither humanitarian reasons nor public benefit warrants the continued presence of the alien in the United States, parole shall be terminated upon written notice to the alien and he or she shall be restored to the status that he or she had at the time of parole. 8 C.F.R. § 212.5(e)(2)(i).

41. That is, "[u]nder the governing regulation, [§ 1182(d)(5)(A)] parole may be terminated only if the purpose of parole is accomplished, or humanitarian reasons and the public benefit no longer warrant parole." *Loaiza Arias v. LaRose*, No. 3:25-cv-02595-BTM-MMP, 2025 WL 3295385, at *3 (S.D. Cal. Nov. 25, 2025).

42. Respondents did not follow the applicable statutory and regulatory requirements to revoke or terminate Petitioner's parole.

43. Petitioner, at the time of his arrest, had a pending asylum application and, prior to his arrest, was never given a "case-by-case" assessment or review of his parole.

44. If Respondents did not follow those requirements, then they did not have lawful authority to arrest and detain Petitioner, "unless there [wa]s some other valid reason to arrest him." *Mata Velasquez*, 794 F. Supp. 3d at 145; cf. Norfolk S. Ry. Co. v. U.S. Dep't of Lab., No. 21-3369, 2022 WL 17369438, at *6 (6th Cir. Dec. 2, 2022) (discussing that "an agency's action that fails to observe the procedures required by its own regulations should be set aside" (citation omitted)); *Wilson v. Comm'r of Soc. Sec.*, 378 F.3d 541, 545 (6th Cir. 2004) ("It is an elemental principle of administrative law that agencies are bound to follow their own regulations[,] . . . [and] '[a]n agency's failure

to follow its own regulations tends to cause unjust discrimination and deny adequate notice and consequently may result in a violation of an individual's constitutional right to due process.'" (additional internal quotation marks omitted) (quoting *Sameena, Inc. v. U.S. Air Force*, 147 F.3d 1148, 1153 (9th Cir. 1998))).

CLAIMS FOR RELIEF

45. The "heart of habeas corpus" is the challenge to a petitioner's confinement (or the duration of his confinement), where he seeks "immediate release or a speedier release from that confinement." *Preiser v. Rodriguez*, 411 U.S. 475, 498 (1973). "The traditional function of the writ is to secure release from illegal custody." *O'Brien v. Moore*, 395 F.3d 499, 505 (4th Cir. 2005) (quoting *Preiser*, 411 U.S. at 484 and citing *Fay v. Noia*, 372 U.S. 391, 430 (1963)).

46. Upon finding a person is in custody in violation of the laws of the United States, a district court may grant a writ of habeas corpus and "dispose of the matter as law and justice so require." 28 U.S.C. §§ 2241(a), 2243.

47. The "typical remedy" for "unlawful executive detention" is release from custody. See *Munaf v. Geren*, 553 U.S. 674, 693 (2008); see also Preiser, 411

U.S. at 484. "[T]he court shall summarily hear and determine the facts, and dispose of the matter as law and justice require." 28 U.S.C. § 2243.

48. There is no process to await. The Constitution requires release. *Larrazabal-Gonzalez v. Mason*, No. 2:26-cv-00049, slip op. at 1–10 (S.D. W. Va. Jan. 28, 2026)

PRAYER FOR RELIEF

WHEREFORE, Petitioner prays that this Court grant the following relief:

A. ORDER Petitioner's immediate release from custody within twenty-four (24) hours because Respondents have detained him in violation of the Fifth Amendment's Due Process Clause—by arresting and redetaining him without constitutionally adequate notice or a meaningful opportunity to be heard—and because his continued detention under 8 U.S.C. § 1231 has extended beyond the ninety-day removal period without any lawful justification.

B. ENJOIN Respondents from transferring Petitioner from the jurisdiction of this District pending these proceedings;

C. To the extent the Court reaches the statutory issues, AWARD Petitioner fees and costs under the Equal Access to Justice Act ("EAJA"), as amended, 28 U.S.C. § 2412, and on any other basis justified under law; and

D. GRANT any other and further relief that this Court deems just and proper.

Respectfully submitted,

By: **/s/ Joseph Williams**

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Dated: 03/10/2026

PROOF OF SERVICE

I hereby certify that on 03/10/2026, I filed the above Petition for Writ of Habeas Corpus with the UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN via PACER and I further certify that all parties and attorneys of record were served with same via email and PACER. I declare that the above statements are true to the best of my information, knowledge and belief.

/s/ Joseph Williams

Joseph Williams (P88177)

Attorney for Petitioner