IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 1:26-cv-01200

MARIA TERESA RODRIGUEZ ALFARO,

Petitioner,

v.

JUAN BALTAZAR, in his official capacity as Warden of the Denver Contract Detention Facility;
ROBERT HAGAN, in his official capacity as Field Office Director, Denver Field Office of U.S. Immigration and Customs Enforcement;
TODD LYONS, in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement;
MARKWAYNE MULLIN, in his official capacity as Secretary of U.S. Department of Homeland Security; and
PAMELA BONDI, in her official capacity as Attorney General of the United States.

Respondents.

PETITION FOR WRIT OF HABEAS CORPUS

INTRODUCTION

1. Petitioner, MARIA TERESA RODRIGUEZ ALFARO, by and through undersigned counsel, respectfully moves this Court for a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241. Alfaro is currently detained at the Denver Contract Detention Facility in Aurora, Colorado, under the custody and control of Respondents.

2. This case presents a narrow but urgent constitutional question: whether Respondents may continue to detain an individual who has been granted relief from removal, is no longer inadmissible, and has twice been granted release on bond by an Immigration Judge. Under these circumstances, Alfaro's continued detention is unlawful.

3. Alfaro's continued detention violates the Fifth Amendment because, after an Immigration Judge granted her application for relief, her detention ceased to bear a reasonable relationship to any legitimate civil immigration purpose.

4. The Court should therefore grant the Petition for Writ of Habeas Corpus and order Alfaro's immediate release.

CUSTODY

5. Alfaro has been in the custody of Respondents since July 29, 2025. She is currently detained at the Denver Contract Detention Facility in Aurora, Colorado, under Respondents' direct physical control and supervision.

JURISDICTION AND VENUE

6. This Court has jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), 28 U.S.C. § 1651 (All Writs Act), 28 U.S.C. § § 2201-02 (declaratory relief), and Article I, section 9, clause 2 of the U.S. Constitution (Suspension Clause), as Alfaro is in custody and challenges her custody in violation of the Constitution and laws of the United States.

7. Federal district courts have jurisdiction under 28 U.S.C. § 2241 to hear habeas claims by individuals challenging the lawfulness of their detention. *See Zadvydas v. Davis*, 533 U.S. 678, 678 (2001).

8. Venue is proper in this District under 28 U.S.C. § 1391 and 28 U.S.C. § 2242 because Alfaro is confined in this District, at least one Respondent is in this District, Alfaro's immediate physical custodian is in this District, and a substantial part of the events giving rise to the claims in this action occurred in this District. *See Trump v. J.G.G.*, 145 S. Ct. 1003, 1005–06 (2025) (per curiam) ("For core habeas petitions, jurisdiction lies in only one district: the district of confinement" (internal quotation marks and citation omitted)).

NOTICE OF RELATED CASES

9. Pursuant to D.C.COLO.LCivR 3.2 and in the interest of judicial economy, Alfaro provides notice that this action is related to numerous habeas petitions recently adjudicated in this District involving the same Respondents, the same detention facility, and the same legal question concerning the legality of the automatic stay provision. *See Merchan-Pacheo v. Noem*, No. 1:25-cv-03860-SBP, 2026 WL 88526, at *1 (D. Colo. Jan. 12, 2026) and *Balderas Rivas v. Baltazar*, No. 1:26-cv-00442-SKC (D. Colo. Feb. 17, 2026).

10. In *Merchan-Pacheco*, Judge Prose was confronted with facts like those here, where an immigration judge found that the petitioner merited release upon posting a $25,000 bond. Although the petitioner's family paid the bond, DHS then invoked the automatic stay provision in 8 C.F.R. § 1003.19(i)(2) so it could appeal the immigration judge's findings to the BIA. Judge Prose conducted a thorough analysis pursuant to *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976), and concluded that the automatic stay provision violated the petitioner's procedural due process rights.

11. In *Balderas Rivas v. Baltazar*, Judge Krew relied on Judge Prose's analysis and specifically asked Respondents to show cause as to why Judge Prose's analysis should not be adopted in the case.

12. As this matter involves the same core statutory question as *Merchan-Pacheco* and *Balderas Rivas*, Alfaro requests that the Court order Respondents to show cause as to why Judge Prose's and Judge Krew's analysis and relief should not be adopted in this case or identify any materially distinguishable facts.

HABEAS CORPUS

13. Challenges to immigration detention are properly brought directly through habeas. *Soberanes v. Comfort*, 388 F.3d 1305, 1310 (10th Cir. 2004). More specifically, 28 U.S.C. § 2241

"confers jurisdiction upon the federal courts to hear such cases." *Zadvydas v. Davis*, 533 U.S. 678, 687 (2001) (citing 28 U.S.C. § 2241(c)(3)) (authorizing any person to claim in federal court that they are being held "in custody in violation of the Constitution or laws ... of the United States").

14. The fundamental purpose of § 2241 habeas proceeding is the same as that of § 2254 habeas and § 2255 proceedings: they are an attack by a person in custody upon the legality of that custody, and that the traditional function of the writ is to secure release from illegal custody. *McIntosh v. U.S. Parole Com'n*, 115 F.3d 809, 811 (10th Cir. 1997) (quoting *Preiser v. Rodriguez*, 411 U.S. 475, 484 (1973)).

PARTIES

A. Petitioner

15. Petitioner Maria Teresa Rodriguez Alfaro was detained by Respondents on July 29, 2025, and has been detained at the Denver Contract Detention Facility in Aurora, Colorado, since that date. She is in the custody and direct control of Respondents and their agents.

B. Respondents

16. Respondent Juan Baltazar is the Warden of the Denver Contract Detention Facility, a private, for-profit detention facility that contracts with ICE to detain individuals suspected of civil immigration violations. Respondent Baltazar has immediate physical custody of Alfaro and is sued in his official capacity.

17. Respondent Robert Hagan is the Field Office Director of the U.S. Immigration and Customs Enforcement Denver Field Office. In this capacity, he is responsible for the administration of immigration laws and the execution of immigration enforcement and detention policy within ICE's Denver Area of Responsibility, including the detention of Alfaro. Respondent Hagan maintains an office and regularly conducts business in this district and is sued in his official capacity.

18. Respondent Todd Lyons is the Acting Director of U.S. Immigration and Customs Enforcement. As the Senior Official Performing the Duties of the Director of ICE, he is responsible for the administration and enforcement of the immigration laws of the United States; routinely transacts business in this District; and is legally responsible for any effort to detain and remove Alfaro. Respondent Lyons is sued in his official capacity.

19. Respondent Markwayne Mullins is the Secretary of the U.S. Department of Homeland Security and has ultimate authority over DHS. In that capacity and through his agents, Respondent Mullins has broad authority over and responsibility for the operation and enforcement of the immigration laws; routinely transacts business in this District; and is legally responsible for pursuing any effort to detain and remove Alfaro. Respondent Mullins is sued in his official capacity.

20. Respondent Pamela Bondi is the Attorney General of the United States and the most senior official of the U.S. Department of Justice (DOJ). In that capacity and through her agents, she is responsible for overseeing the implementation and enforcement of the federal immigration laws. The Attorney General delegates this responsibility to the Executive Office for Immigration Review, which administers the immigration courts and the Board of Immigration Appeals. Respondent Bondi is sued in her official capacity.

FACTUAL ALLEGATIONS

21. Alfaro is a 42 year-old native and citizen of Mexico. On or about April 1, 1992, Alfaro entered the United States near Calexico, California, without being admitted or paroled after inspection by an immigration officer. *See Notice to Appear, dated July 29, 2025, attached hereto as Attachment A.*

22. Alfaro was only encountered by immigration officials when she, with her valid license and insurance, drove her brother to a court hearing related to a traffic violation to translate for him and agents stopped her to question her brother. *See Order of the Immigration Judge Granting Non-LPR Cancellation of Removal, dated November 8, 2025, attached hereto as Attachment C.*

23. Respondents subsequently arrested and detained her pursuant to an administrative warrant for her arrest and initiated removal proceedings against her through the filing of a Notice to Appear with the court on July 29, 2025. *See DHS Form I-200, Warrant for Arrest of Alien, dated July 29, 2025, attached hereto as Attachment B.*

24. Alfaro has no criminal history. *See Attachment C, attached hereto.*

25. Alfaro is not at fault for entering the United States as she did in 1992, since she was only a nine (9) year-old child when her parents brought her to this country. *See Attachment C, attached hereto.*

26. Moreover, for ten years from 2013 through 2023, DHS granted her deferred action for childhood arrivals (DACA), repeatedly recognizing she came to the U.S. as a child and deserved deferral of her removal. Alfaro only lost DACA when she made an error in her online application to properly renew it. *See Attachment C, attached hereto.*

27. Alfaro has been gainfully employed and is a business owner. As such, she has been contributing to the U.S. economy and has been paying her state and federal taxes. *See Attachment C, attached hereto.*

28. On November 8, 2025, the Immigration Judge Allison Kane granted Alfaro's application for Non-LPR Cancellation of Removal. *See Attachment C, attached hereto.*

29. On December 8, 2025, DHS appealed that decision. *See Filing Receipt for DHS Appeal, dated December 11, 2025, attached hereto as Attachment D.*

30. On January 25, 2026, the Immigration Judge granted Alfaro bond in the amount of $ 1,500.00. *See Amended Order of the Immigration Judge Regarding Bond, dated February 23, 2026, attached hereto as Attachment E.*

31. On January 26, 2026, DHS invoked the automatic stay provision at 8 C.F.R. § 1003.19(i). On February 5, 2026, the automatic stay was perfected when DHS filed a Notice of Appeal with the Board of Immigration Appeals.

32. On February 22, 2026, the Immigration Judge amended the bond order to again grant bond in the amount of $ 1,500.00. *See Attachment E, attached hereto.*

33. On February 23, 2026, DHS filed an EOIR-43, Notice of ICE Intent to Appeal Custody Redetermination, of the amended bond order. *See EOIR-43, Notice of ICE Intent to Appeal Custody Redetermination, dated February 23, 2026, attached hereto as Attachment F.*

34. Alfaro remains detained solely because DHS appealed the Immigration Judge's grant of Non-LPR Cancellation of Removal and continue to invoke the automatic stay despite there being no lawful basis for her continued detention.

35. Alfaro's continued detention causes ongoing and irreparable harm. Each additional day she spends in unlawful detention subjects her to further irreparable harm.

LEGAL FRAMEWORK

I. Constitutional Limits on Civil Immigration Detention

36. Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty protected by the Due Process Clause. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

37. Because immigration detention is civil rather than criminal, it must comply with both substantive and procedural due process limitations.

38. Substantive due process requires that all forms of civil detention—including immigration detention—bear a "reasonable relation" to a non-punitive purpose. *See Jackson v. Indiana*, 406 U.S. 715, 738 (1972). The Supreme Court has recognized only two permissible non-punitive purposes for immigration detention: ensuring a noncitizen's appearance at immigration proceedings and preventing danger to the community. *Zadvydas*, 533 U.S. at 690–92; *see also Demore v. Kim*, 538 U.S. 510 at 519–20, 527–28, 531 (2003).

39. Detention that is not reasonably related to either of those purposes violates substantive due process.

40. Procedural due process requires adequate procedural protections that ensure the government's justification for a noncitizen's physical confinement outweighs the individual's constitutionally protected interest in avoiding physical restraint. *Zadvydas*, 533 U.S. at 690.

41. To determine whether a civil detention violates a detainee's due process rights, courts apply the three-part test set forth in *Mathews v. Eldridge*, and weigh the following three factors: (1) "the private interest that will be affected by the official action;" (2) "the risk of an erroneous deprivation of such interest through the procedures used, and the probable value, if any, of additional or substitute procedural safeguards;" and (3) "the Government's interest, including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail." *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976).

II. Automatic and Discretionary Stay Regulations

42. When an Immigration Judge orders release on bond and the government appeals, the regulations provide two mechanisms to stay that custody order: a discretionary or automatic stay.

43. Under the discretionary stay mechanism, DHS must file a motion and persuade the BIA that a stay is warranted. 8 C.F.R. § 1003.19(i)(1). The BIA serves as a neutral adjudicator and weighs the merits of DHS's position. DHS did not use that mechanism here.

44. Instead, DHS invoked the automatic stay regulation. This mechanism involves no neutral adjudicator considering the merits, and instead, allows the prosecutor—who lost before the IJ—to unilaterally stay the IJ's decision. *See* 8 C.F.R. § 1003.6.

45. Regulations provide that DHS's automatic stay will lapse in 90 days on May 25, 2026, absent a BIA decision on the appeal. 8 C.F.R. § 1003.6(c)(4). But there are multiple avenues for extension. For example, if the BIA does not issue a decision in the 90-day window, DHS can then seek an additional discretionary stay from the BIA. 8 C.F.R. § 1003.6(c)(5). The automatic stay remains in effect for another 30 days while the BIA decides whether to grant a discretionary stay. *Id.*

46. Likewise, even if the BIA rules in favor of Alfaro on appeal and authorizes her release on bond, that release is automatically stayed for five more business days to give DHS a chance to refer the case to the Attorney General. 8 C.F.R. § 1003.6(d). Then, if DHS refers the case to the Attorney General, the automatic stay is extended for another 15 days. *Id.* The Attorney General may then stay release for the pendency of the case. *Id.* There is no prescribed time limit for final resolution of the custody determination, meaning an individual may remain in detention indefinitely.

47. In sum, Alfaro has no way of knowing how long this automatic stay will last and has no opportunity to challenge the stay. In practice, the automatic stay regulation renders the IJ's custody decision ineffectual: if DHS disagrees with a custody decision, it can keep Alfaro detained for a minimum of 90 days, without a truly discernable end point.

CLAIMS FOR RELIEF

Count One
Violation of the Immigration and Nationality Act
Detention Not Authorized by 8 U.S.C. § 1226(a)

48. Alfaro realleges and incorporates herein the allegations contained in the preceding paragraphs of the petition as if fully set forth herein.

49. 8 U.S.C. § 1226(a) authorizes arrest, detention, or release on bond "pending a decision on whether the alien is to be removed from the United States." 8 U.S.C. § 1226(a). That detention authority is therefore limited. It exists only so long as custody remains tethered to the statutory purpose Congress identified: detention pending a merits decision in removal proceedings.

50. Before November 8, 2025, Respondents could at least argue that detention was incident to ongoing removal proceedings while the Immigration Court determined whether Alfaro would be removed or instead granted lawful status. But after the Immigration Judge granted Non-LPR Cancellation of Removal, the posture changed. Alfaro is no longer merely seeking relief; she has prevailed before the court charged with adjudicating that relief in removal proceedings. The remaining issue is not whether she qualifies for relief in the first instance, but whether DHS can overturn that favorable adjudication on appeal.

51. Once the Immigration Judge granted Non-LPR Cancellation of Removal, Alfaro was no longer "pending a decision on whether [she] is to be removed from the United States," but instead is now permitted to remain lawfully in the United States. By the plain language of 8 U.S.C.

§ 1226(a), Respondents have lost authority for Alfaro's continued detention, even with the pending appeal. At that point, continued detention ceased to be detention pending a merits determination and instead became detention solely because Respondents elected to pursue appellate review.

52. Section 1226(a) does not authorize detention for that purpose. Its text permits detention only pending a decision on removability, not detention by default while the government seeks to overturn a grant of relief already entered in the noncitizen's favor. Reading § 1226(a) to authorize continued detention in these circumstances would untether custody from the statute's text and transform a limited pre-decision detention provision into a broad license for incarceration throughout the government's entire appellate process. Nothing in the INA authorizes that result.

53. Any legal justification for Alfaro's detention has ceased to exist following the IJ's grant of her application for Non-LPR Cancellation of Removal, as she is no longer inadmissible. Therefore, there is no statutory authority authorizing her detention.

54. As such, the Court should order Alfaro immediately released.

Count Two
Violation of the Due Process Clause of the Fifth Amendment to the United States Constitution – Substantive Due Process

55. Alfaro realleges and incorporates herein the allegations contained in the preceding paragraphs of the petition as if fully set forth herein.

56. The Due Process Clause protects all persons against arbitrary detention. *See Zadvydas v. Davis*, 533 U.S. 678, 693 (2001). "Freedom 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. *Id.* at 690.

57. Respondents' interest in civil immigration detention is to effectuate removal and safeguard the community.

58. On November 8, 2025, the Immigration Judge granted Alfaro's application for Non-LPR Cancellation of Removal. Although DHS has appealed, the Immigration Judge's ruling is still a formal adjudication by the government that Alfaro qualifies for permanent resident status under the governing statute. While an appeal is pending, that does not erase the constitutional significance of the adjudication the government has already made.

59. Furthermore, the Immigration Judge conducted an individualized bond hearing and determined that Alfaro was neither a danger to the community nor a flight risk. That determination eliminated the only constitutionally permissible basis for continued civil detention.

60. The automatic stay regulation nevertheless allowed DHS—without any neutral adjudication—to nullify that reasoned decision and continue detention automatically.

61. When promulgated in October 2001, the Attorney General justified the automatic stay regulation as an emergency response to the September 11 terrorist attacks. The articulated basis for the necessity of the automatic stay provision was to afford DHS the time necessary to ensure that a potentially dangerous alien did not flee and to protect the public from an alien "that it believes is a threat to national security or the public safety." *Executive Office of Immigration Review; Review of Custody Determination*, 66 Fed. Reg. 54909, 54910 (Oct. 31, 2001).

62. Those justifications are absent here. An Immigration Judge has already determined—after an adversarial hearing—that Alfaro poses no threat to public safety and no meaningful risk of flight. Detention untethered to flight risk or dangerousness ceases to be regulatory and becomes punitive in effect, as is the case here with Alfaro.

63. Multiple courts have concluded that such unilateral detention after a neutral adjudicator has ordered release fails to satisfy substantive due process. *See Zavala v. Ridge*, 310

F. Supp. 2d 1071, 1077 (N.D. Cal. 2004); *Ashley v. Ridge*, 288 F. Supp. 2d 662, 669 (D.N.J. 2003); *Mayo Anicasio v. Kramer*, No. 4:25cv3158 (D. Neb. Aug. 14, 2025).

64. Because no special justification outweighs Alfaro's fundamental liberty interest, her continued detention pursuant to the automatic stay violates substantive due process.

65. Due process also prohibits Respondents from punishing people through civil detention. Civil detention becomes punitive when its nature or duration is unreasonable relative to the purpose for which the individual is detained—in this case, effectuating removal and safeguarding the community.

66. Because Alfaro is not removable and she has no criminal history, Respondents have no lawful interest in or authority to detain her and her detention has become excessive in relation to Respondents' interests.

67. When a civil restriction is excessive in relation to a governmental interest, the punitive detention violates the person's right to substantive due process.

68. Alfaro's detention is excessive both in nature and duration. But for the administrative appeal of her granted application, she is a lawful permanent resident who is not removable from the United States.

69. For these reasons, Alfaro's unjustified and prolonged detention violates substantive due process.

70. Accordingly, the Court should order Alfaro immediately released.

Count Three
Violation of the Due Process Clause of the Fifth Amendment to the United States Constitution – Procedural Due Process

71. Alfaro realleges and incorporates herein the allegations contained in the preceding paragraphs of the petition as if fully set forth herein.

72. Even if continued detention could theoretically serve a permissible purpose, the procedures employed must satisfy constitutional requirements under *Mathews v. Eldridge*, and here, each factor favors Alfaro.

73. Pursuant to *Mathews v. Eldridge*, courts weight the following factors in evaluating due process claims: (1) "the private interest that will be affected by the official action"; (2) "the risk of an erroneous deprivation of such interest through the procedures used, and the probable value, if any, of additional or substitute procedural safeguards"; and (3) "the Government's interest, including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail." *Mathews*, 424 U.S. at 335.

74. Alfaro has a significant private liberty interest at stake.

75. Alfaro's interest in physical freedom "is the most elemental of liberty interests." *Hamdi v. Rumsfeld*, 542 U.S. 507, 529 (2004); *Vizguerra-Ramirez v. Baltazar*, No. 25-cv-00881-NYW, 2025 WL 3653158, at *13 (D. Colo. Dec. 17, 2025) (same).

76. Alfaro is being held in an ICE detention facility far removed from any friends or family. *See Velasco Lopez v. Decker*, 978 F.3d 842, 851 (2d Cir. 2020) (finding, in assessing the first *Mathews* factor, that "[t]he deprivation [petitioner] experienced while incarcerated was, on any calculus, substantial. He was locked up in jail. He could not maintain employment or see his family or friends or others outside normal visiting hours.").

77. This is despite her not being accused of any crime. *See, e.g.*, *Maza v. Hyde*, No. 25-cv-12407-IT, 2025 WL 2951922, at *3 (D. Mass. Oct. 20, 2025).

78. The risk of erroneous deprivation is also considerable in this case.

79. An Immigration Judge has determined on two (2) separate occasions that Alfaro is not a danger to the community nor a flight risk and awarded bond in the amount of $ 1,500. The fact

that Respondents may believe they had a valid reason to continue detaining Alfaro does not eliminate their obligation to effectuate the detention in a manner that comports with due process. *E.A.T.B. v. Wamsley*, 795 F. Supp. 3d 1316, 1322 (W.D. Wash. 2025).

80. Once Alfaro had already been granted relief from removal, any purported supervisory review of the automatic stay should have focused on the legal significance of that changed posture and whether continued detention still served any legitimate civil immigration purpose. But the stay was nevertheless invoked, suggesting that no meaningful review occurred, and that detention continued by default. In a case involving physical liberty, that kind of reflexive process is constitutionally inadequate.

81. The public interest favors Alfaro rather than Respondents here. Unnecessary detention "imposes substantial societal costs," as it "separates families and removes from the community breadwinners, caregivers, parents, siblings and employees." *Hernandez-Lara v. Lyons*, 10 F.4th 19, 33 (1st Cir. 2021) (quoting *Velasco Lopez*, 978 F.3d at 855).

82. Alfaro has experienced these hardships; she has no criminal record and has been granted relief from removal, but nevertheless she continues to be held in detention separated from her family and broader community.

83. Respondents' interest here is minimal, especially in contrast to the significant countervailing interests at stake for Alfaro.

84. Accordingly, the *Mathews* factors each weigh heavily in favor of Alfaro's release and that her continued detention violates the Due Process Clause of the Fifth Amendment, and the Court should order Alfaro immediately released.

PRAYER FOR RELIEF

Petitioner MARIA TERESA RODRIGUEZ ALFARO respectfully requests that this Court:

(1) Assume jurisdiction over this matter;

(2) Issue an Order to Show Cause ordering Respondents to show cause within three (3) days as to why this Petition should not be granted as required by 28 U.S.C. § 2243;

(3) Grant the Petition for Writ of Habeas Corpus and order Respondents to immediately release Alfaro from custody upon posting the $ 1,500 bond previously set by the Immigration Judge, or, in the alternative, on her own recognizance;

(4) Declare that Respondents lack lawful authority to continue detaining Alfaro following the Immigration Judge's grant of Non-LPR Cancellation of Removal and repeated determinations that she warrants release on the minimum statutory bond, and that her continued detention violates the Due Process Clause of the Fifth Amendment and the Immigration and Nationality Act;

(5) Enjoin Respondents from re-detaining Alfaro absent a new, independent, and lawful basis consistent with her grant of Lawful Permanent Resident status, and require that any future custody be supported by written notice of the legal authority and factual predicate; and

(6) Grant any further relief the Court deems just and proper.

Dated this 23rd day of March 2026.

Respectfully submitted,

/s/ Skylar M. Larson
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ATTORNEY FOR PETITIONER

CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing **Petition for Writ of Habeas Corpus and Attachments A-F** will be effectuated contemporaneously with the Court's issuance of an Order directing service, at which time true and correct copies will be sent to the following:

JUAN BALTAZAR, Warden of the Denver Contract Detention Facility
3130 N Oakland Street
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Respondent

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/s/ Skylar M. Larson
Skylar M. Larson, Esq.

ATTORNEY FOR PETITIONER

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Respondents.

ATTACHMENTS TO PETITION FOR WRIT OF HABEAS CORPUS

ATTACHMENT A.	Notice to Appear, dated July 29, 2025
ATTACHMENT B.	DHS Form I-200, Warrant for Arrest of Alien, dated July 29, 2025
ATTACHMENT C.	Order of the Immigration Judge Granting Non-LPR Cancellation of Removal, dated November 8, 2025
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