U.S. Department of Justice

United States Attorney

Eastern District of Pennsylvania

Judith A. Amorosa, AUSA
Direct Dial: (267) 535-9115
Facsimile: (215) 861- 8618
E-mail Address: Judith.Amorosa@usdoj.gov

615 Chestnut Street
Suite 1250
Philadelphia, Pennsylvania 19106-4476
(215) 861-8200

April 16, 2026

Via ECF Filing
Honorable John M. Gallaher
Judge, United States District Court
Edward N. Cahn Courthouse & Federal Building
504 W. Hamilton Street, Suite 4701
Allentown, PA 18101

Re: *Manzueta Mieses v. Jamison*, No. 26-2454

Dear Judge Gallagher:

Please accept this letter brief in response to the Court's April 15, 2026 email requesting that respondents advise the Court whether they oppose Mr. Manzueta Mieses's petition and, if so, whether they intend to make any arguments other than those made by the government in *Moran Valle v. Wamsley et al.*, No. 2:25-cv-07110 (E.D. Pa. Jan. 27, 2026).

Respondents oppose the Petition for the same reasons set forth in the Respondents' opposition to the *Moran Valle* petition and incorporate those arguments by reference herein. Specifically, that Petitioner here is subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A).[1]

Sincerely,

/s/ Judith A.K. Amorosa
JUDITH A.K. AMOROSA
Assistant United States Attorney

cc: counsel of record, via ECF

[1] The government is pursuing appeals in the Third Circuit related to both statutory and constitutional due-process claims. The matters on appeal are *Lopes De Andrade v. Director Philadelphia Field Office Immigration and Customs Enforcement, et al.*, No. 26-1454 (3d Cir.), and *Buele Morocho v. Warden Philadelphia FDC, et al.*, No. 26-1150 (3d Cir.), which are now consolidated for all purposes. The government's consolidated opening brief was filed on March 20, 2026. The Third Circuit granted the Government's motion to expedite the consolidated appeals and scheduled them for disposition by the Court during the week of May 11, 2026.