

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 26-CV-61123-LEIBOWITZ**

ANGEL GABRIEL ROBLERO-FIGUEROA,

Petitioner,

v.

**FIELD OFFICE DIRECTOR,
BROWARD TRANSITIONAL CENTER, et al.,**

Respondents.

**NOTICE OF INTENT TO COMPLY WITH ORDER IN HABEAS CASES SEEKING
RELIEF PURSUANT TO 8 U.S.C. § 1226(a)**

Respondent hereby gives notice of intent to comply with the Court's Order (DE 5) that provides Petitioner an individualized bond hearing, consistent with 8 U.S.C. § 1226(a) within fourteen (14) days of the entry of the Order, in that this matter is not factually or legally distinguishable from the cases cited to by the Court where petitioners were detained pursuant to 8 U.S.C. § 1225(b)(2)(A).

Respondent construes the Court's order that an "individualized bond hearing" be held to mean a custody redetermination hearing before the Executive Office for Immigration Review ("EOIR"). To this end, Respondent will immediately, through the undersigned counsel, advise the United States Department of Justice's EOIR of the Court's Order and request that Plaintiff be provided a bond hearing as ordered by the Court. Respondent elects to comply with the Court's order for a bond hearing because this case is not factually or legally distinguishable from those cited to by the Court, where the alien is an applicant for admission subject to mandatory detention pursuant to 1225(b)(2)(A). Nevertheless, to preserve the

government's rights on appeal and consistent with its position in similar cases, Respondent hereby adopts and incorporates by reference the legal arguments made by the respondents to the petitions for writ of habeas corpus filed in *Ocampo Fernandez v. Ripa*, No. 1:25-cv-24981-DSL, ECF No. 17 (S.D. Fla. Nov. 25, 2025); *Landaverde v. Ripa*, No. 0:25-cv-62474-DSL, ECF No. 11 (S.D. Fla. Dec. 18, 2025); *Velasquez v. Diaz*, et al., No. 1:25-cv-25604-DSL, ECF No. 24 (S.D. Fla. Dec. 18, 2025); *Martinez v. Field Off. Dir.*, No. 1:25-cv-26026-DSL, ECF No. 7 (S.D. Fla. Jan. 14, 2026); *Moncada v. Noem*, et al., 0:25-cv-62285-DSL, ECF No. 14 (S.D. Fla. Jan. 16, 2026), and *Perez v. Parra*, No. 1:25-cv-24820-KMW, ECF No. 9 at 6–10 (S.D. Fla. Oct. 27, 2025).

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 21, 2026, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

By: s/ Carolina Perez Schmerold
Carolina Perez Schmerold
Assistant United States Attorney