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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LUIS ANTONIO MOLINA ALBERTO,

Petitioner,

v.

TODD BLANCHE, *et al.*

Respondents.

Case No. 2:26-cv-01208-RFB-BNW

**Federal Respondents' Response to
Petitioner's Verified Petition For
Habeas Corpus (ECF No. 4)**

**NO ORAL ARGUMENT
REQUESTED**

Federal Respondents hereby file their Response to Petitioner Luis Antonio Molina Alberto (ECF No. 4). Pursuant to the Order to Show Cause, Federal Respondents do not request oral argument or an evidentiary hearing on the Petition and request the Court rule on the papers. ECF No. 3.

Pursuant to the Order Granting Partial Summary Judgment in *Jacobo-Ramirez v. Mullin*, No. 2:25-cv-02136-RFB-MDC, 2026 LEXIS 175584 (D. Nev. Mar. 30, 2026), this Court certified the class in its class wide judgment. Based on the decision by this Court in *Jacobo-Ramirez*, and the Order to Show Cause in this matter, Petitioner is a Class Member. The documents noted in the Order to Show Cause are not available to this office at this time. A request has been made with OIL/ICE and this response will be supplemented as soon as they are received by this office.

1 Federal Respondents reserve their right to appeal the decisions in *Jacobo-Ramirez* and
2 in this matter. Federal Respondents do not waive nor concede their prior litigated positions
3 regarding 8 U.S.C. § 1225(b)(2)(A) and fully incorporate them herein for appellate purposes
4 including the appellate decisions from the Fifth Circuit Court of Appeals, *Buenrostro-Mendez*
5 *v. Bondi*, 2026 U.S. App. LEXIS 3899 (5th Cir. 2026) and from the Eighth Circuit Court of
6 Appeals, *Avila v. Bondi*, 2026 U.S. App. LEXIS 8799 (8th Cir. 2026) supporting the Federal
7 Respondents' position.

8 Respectfully submitted this 24th day of April 2026.

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10 TODD BLANCHE
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12 /s/ Tamer B. Botros
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14 *Attorneys for the Federal Respondents*
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