

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**



Andreiver Alfredo Muñoz, Petitioner

v.

Respondents

Case No. 26CV3655-BJC-DDL

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EXHIBIT INDEX

The following exhibits are submitted in support of Petitioner's Reply in Support of the Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241:

- | Exhibit A | Proof of birth of Petitioner's U.S. Citizen Son, born June 24, 2026. |
- | Exhibit B | Petitioner's Reply in Support of the Petition for Writ of Habeas Corpus.
- | Exhibit C | Declaration of Brittany Sagen. |
- | Exhibit D | Petitioner's Proposed Release Plan. |

Petitioner respectfully replies to Respondents' July 7, 2026 response.

Respondents acknowledge that this Court's prior decisions control because Petitioner's facts are not materially distinguishable, do not oppose the petition, and defer to the Court regarding the appropriate relief.

Petitioner respectfully requests that the Court grant the relief requested in the Petition by ordering immediate release. Continued detention pending a future bond hearing would unnecessarily prolong Petitioner's detention despite Respondents' concession that this case is controlled by this Court's prior decisions.

Petitioner has strong family ties, including his U.S. citizen fiancée and newborn U.S. citizen child born [REDACTED]. Petitioner has a stable residence available in Ogden, Utah, intends to comply with all conditions of release, and will continue pursuing all immigration proceedings, including his pending appeal.

Petitioner respectfully requests that the Court grant the Petition and order immediate release, or such further relief as the Court deems just and proper.

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DECLARATION OF BRITTANY SAGEN

I, Brittany Sagen, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct based upon my personal knowledge:

My name is Brittany Sagen. I am a citizen of the United States and reside in Ogden, Utah. I submit this declaration in support of my fiancé, Andreiver Alfredo Muñoz, and his Petition for Writ of Habeas Corpus.

Andreiver and I met on July 9, 2024. Since that time, we have built a committed relationship, started a family together, and intend to marry and pursue lawful immigration relief through the appropriate legal process.

Andreiver was taken into immigration custody when I was approximately eight weeks pregnant with our son. Since that time, we have been forced to experience nearly my entire pregnancy and the birth of our child while separated because of his detention.

Throughout my pregnancy, I attended every prenatal appointment alone. Andreiver wanted to be present for each appointment and support me throughout the pregnancy, but because he remained detained, he was unable to attend or provide support in person.

My pregnancy became high risk after I was diagnosed with complete placenta previa. I lived with the constant fear that complications could arise at any time, and I faced those challenges without my fiancé by my side.

Near the end of my pregnancy, I developed preeclampsia and hypertension. Because I do not have family nearby and did not have anyone available to take me to the hospital, I had to drive myself for medical care despite experiencing serious pregnancy complications.

I ultimately underwent an emergency cesarean section and remained hospitalized for three days following the birth of our son. When I was discharged, I again had no choice but to drive myself home while recovering from major surgery because Andreiver remained in immigration detention.

Our son was born on [REDACTED] and he is a United States citizen. Andreiver was unable to be present for the birth of our son. He missed the delivery, the first moments of our child's life, and the opportunity to hold his son for the first time.

To this day, Andreiver has only been able to see our son through video calls from detention. He has never been able to hold him, comfort him, or participate in his daily care.

Since giving birth, I have largely cared for our newborn on my own while recovering from an emergency cesarean section. I do not have family nearby to assist me, and the emotional, physical, and financial responsibilities have been overwhelming.

Andreiver is a loving father and devoted partner. His continued detention has prevented him from supporting me during a high-risk pregnancy, helping care for our newborn son, and beginning his role as a father in person.

If released, Andreiver will immediately reside with me at:



He will have stable housing, a safe place to live, and family support while continuing to pursue his immigration case.

Andreiver and I intend to marry and pursue all available lawful immigration relief together. We are committed to following every legal requirement and appearing for all immigration and court proceedings.

I believe Andreiver will comply with every condition of release, attend all required hearings, report as directed, and obey all laws. He wants the opportunity to be present for our son, support our family, and continue pursuing his immigration case through the legal process.

Andreiver's continued detention has caused extraordinary hardship for our family. It has deprived our newborn son of the opportunity to have his father present during the earliest weeks of his life and has forced me to endure a high-risk pregnancy, childbirth, major surgery, and the responsibilities of caring for a newborn almost entirely alone.

I respectfully ask this Court to consider the profound humanitarian impact that Andreiver's continued detention has had on our family and to grant the relief requested in his Petition so that he may return home, care for his son, support our family, and continue to pursue his immigration proceedings while complying with all legal requirements.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this ____ day of _____, 2026, in Ogden, Utah.

Brittany Sagen

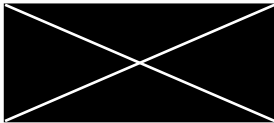
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PETITIONER'S PROPOSED RELEASE PLAN

Petitioner, Andreiver Alfredo Muñoz, respectfully submits the following proposed release plan for the Court's consideration in support of his Petition for Writ of Habeas Corpus.

Residence

Upon release from immigration custody, Petitioner will immediately reside with his U.S. citizen fiancée and newborn child at:



This residence will provide Petitioner with stable housing and family support while he continues to participate in all immigration proceedings.

Family Support

Petitioner has a committed relationship with his U.S. citizen fiancée. Together they are caring for their U.S. citizen child, who was born on A black rectangular box with a white 'X' inside, used to redact the date of birth.

Petitioner's continued detention prevents him from assisting with the care and financial support of his newborn child and places a substantial hardship on his family.

Compliance with Court and Immigration Requirements

If released, Petitioner agrees to:

- Appear at every immigration court hearing and any federal court proceedings.
- Comply with all reporting requirements imposed by ICE.
- Keep ICE and the immigration court informed of any change of address.
- Obey all federal, state, and local laws.
- Comply with any additional conditions of release ordered by the Court or imposed by ICE.

Petitioner understands the importance of complying with all legal obligations and is committed to appearing for every required proceeding.

Immigration Proceedings

Petitioner remains actively engaged in his immigration case and is pursuing available legal remedies. Petitioner intends to continue participating fully in those proceedings and has no intention of avoiding or delaying the judicial process.

Community Ties

Petitioner has strong family ties in the United States through his fiancée and newborn child. His release would allow him to provide emotional and financial support to his family while continuing to pursue lawful immigration relief.

Conclusion

Petitioner respectfully submits that this release plan demonstrates that he has a stable residence, significant family support, and every intention of complying with all future legal obligations. Accordingly, Petitioner respectfully requests that the Court order his immediate release from immigration custody.

Respectfully submitted,

Andreiver Alfredo Muñoz

Pro Se Petitioner

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

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CERTIFICATE OF SERVICE

I, Andreiver Alfredo Muñoz, certify that I am the Petitioner in this action and that I caused a true and correct copy of the following documents to be served on counsel for Respondents:

- Petitioner's Reply in Support of Petition for Writ of Habeas Corpus;
- response from Petitioner;
- Declaration of Brittany Sagen;
- Petitioner's Proposed Release Plan;
- Exhibit Index and Exhibits; and
- Proposed Order.

Service was made by placing the documents in the United States Mail, first-class postage prepaid, addressed to:

Danielle L. Brown
Special Assistant United States Attorney
880 front street, Room 6293, San Diego, CA
92101-8893

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on July 11, 2026.

Andreiver Alfredo Muñoz
Pro Se Petitioner