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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

J.C.Z.L.,

Petitioner,

v.

Minga WOFFORD, Facility Administrator, Mesa Verde ICE Processing Center; Sergio ALBARRAN, Acting Field Office Director, San Francisco Immigration and Customs Enforcement; David VENTURELLA, Acting Director, United States Immigration and Customs Enforcement; Markwayne MULLIN, Secretary of the United States Department of Homeland Security; Todd BLANCHE, Attorney General of the United States, acting in their official capacities,

Respondents.

Case No. 1:26-cv-05342-NW

PETITIONER'S REPLY TO RESPONDENTS' OPPOSITION TO PETITION FOR WRIT OF HABEAS CORPUS AND ALL INJUNCTIVE RELIEF

I. INTRODUCTION

The Petitioner, J.C.Z.L., through undersigned counsel, respectfully replies to the Respondents' response in opposition to J.C.Z.L.'s petition for writ of habeas corpus and all injunctive relief (ECF 8). In their opposition, Respondents do not allege that they made an individualized determination that there are materially changed circumstances as to Petitioner's dangerousness or flight risk. They do not allege Petitioner's arrest was pursuant to a warrant. Instead they attempt to introduce a lengthy Spanish-language document that is untranslated and unauthenticated, as well as a facially unreliable document purporting to be a warrant. Respondent's only legal argument is that J.C.Z.L.'s detention is governed by the mandatory detention authority under 8 U.S.C. § 1225(b), which courts from this district have repeatedly rejected. *See* Resp. Opposition, ECF 8 at 2. In responding to this Court's order to distinguish the instant case from recent decisions rejecting the 1225(b) argument, Respondents rely on the unsubstantiated, false claim that Petitioner is affiliated with a gang and/or has engaged in criminal conduct. Respondents, however, fail to address J.C.Z.L.'s arguments—that he was re-detained in violation of his right to procedural due process, his right to substantive due process, the Administrative Procedures Act (APA), and the Immigration and Nationality Act. Further, as discussed below, Respondents' opposition fails to provide any persuasive reason why this Court should not grant J.C.Z.L.'s application for a TRO and order him to be immediately released from custody.

II. ARGUMENT

A. Respondents Failed to Address Petitioner's Request for Relief Pursuant to *Garro Pinchi v. Noem.*

The *Garro Pinchi* Court stayed the Re-Detention Policy, under which Respondents re-

arrested and re-detained previously released noncitizens without an individualized determination of materially changed circumstances as to flight risk or dangerousness warrant re-detention. *Garro Pinchi v. Noem*, 813 F. Supp. 3d 973, 1009 (N.D. Cal. 2025). Respondents do not address the relevance of the *Garro Pinchi* order, and thus have waived any arguments on that point. *See, e.g., Urias v. Semaia,* No. 5:26-CV-02753-DTB, 2026 WL 1710375, at *6 (C.D. Cal. June 10, 2026) ("Respondents failed to respond entirely to Petitioner's argument regarding his allegedly unlawful arrest. Thus, the Court construes Respondents' failure to address Petitioner's claim as their consent to the validity of the facts and arguments in support thereof pursuant to Central District of California Local Civil Rule 7-12."). Respondents do not contest Petitioner's membership in the *Garro Pinchi* class. Respondents' opposition in fact confirms Petitioner's characteristics defining him as a class member. *See* Declaration of Deportation Officer Juan Abad, ("DO Decl.") ECF 8-1. To wit: (a) Petitioner is in the jurisdiction of the San Francisco ICE Field Office—DO Abad is at a sub-office of the San Francisco Field Office and is assigned to J.C.Z.L.'s case. *Id.* at p. 1 ¶ 1. (b) Petitioner entered the United States without inspection. *Id.* at p. 2 ¶ 2. (c) Petitioner was charged with inadmissibility under 8 U.S.C. § 1182 and was released form DHS custody. *Id.* at p. 9 (Exh. 2 to DO Decl, Form I-213, Record of Deportable/Inadmissible Alien, dated September 27, 2023). (d) Petitioner is in removal proceedings under 8 U.S.C. § 1229a. *Id.* at p. 3 ¶ 10. (e) Petitioner is not subject to detention under 8 U.S.C. § 1226(c), and Respondents do not so allege.

Respondents do not address this argument, do not contest class membership, and do not explain how their actions complied with the *Garro Pinchi* order when they arrested J.C.Z.L.

B. Respondents Failed to Address Petitioner's Request for Relief Pursuant to 8 U.S.C. § 1226(a)/8 C.F.R. § 287.8(c)(2)(ii) – Warrantless Arrest

Petitioner was re-detained on June 23, 2026. *See* DO Decl. ECF 8-1 at p. 3 ¶ 9; *Id.* Exh.

1. He was not given a warrant at the time of his arrest. This violation of the warrant requirement at 8 U.S.C. § 1226(a) and its implementing regulation 8 C.F.R. § 287.8(c)(2)(ii) was Petitioner's fourth claim for relief, and Respondents' opposition does not mention it at all. This Court should thus consider the issue conceded. *See, e.g.*, *Urias v. Semaia,* 2026 WL 1710375, at *6. ("Respondents failed to respond entirely to Petitioner's argument regarding his allegedly unlawful arrest. Thus, the Court construes Respondents' failure to address Petitioner's claim as their consent to the validity of the facts and arguments in support thereof pursuant to Central District of California Local Civil Rule 7-12.").

DO Abad attached a document to his declaration at Exh. 5: Warrant for Arrest, dated June 22, 2026. *Id.* at pp. 2, 84. The document, however, states that it was served on J.C.Z.L. on June 22, 2026, the day before his arrest which took place on June 23, 2026. Therefore it is not credible. Moreover, neither Respondents' opposition nor Deportation Officer Abad's declaration contains any information about this purported warrant. "DO Abad states U.S. Border Patrol Agents encountered Petitioner during an operation in support of the San Diego sector." *Id.* at ¶ 9. The I-213 dated June 23, 2026, includes no mention of a warrant. The purported warrant, attached to Officer Abad's declaration, is not credible on its face. Respondents neither assert nor provide evidence that that Petitioner was presented with a warrant at the time of his arrest, and they fail to respond to the claim.

C. Petitioner Is Not an Applicant for Admission and Not Subject to Mandatory Detention Under the Statute.

Respondents argue that Petitioner is subject to mandatory custody under 8 U.S.C. § 1225(b)(2)(A), which "applies primarily to [noncitizens] seeking entry into the United States" (applicants for admission) and "mandate[s] detention" of these noncitizens "until certain proceedings have concluded." *Jennings*, 583 U.S. at 297.

Conversely, 8 U.S.C. § 1226 "applies to [noncitizens] already in the United States" and

provides for both mandatory detention under subsection (c) for noncitizens with specific criminal histories, and discretionary detention under subsection (a). *Id.* Under 8 U.S.C. § 1226(a), the Attorney General has discretion to continue to detain a noncitizen or release the noncitizen on bond or conditional parole. 8 U.S.C. § 1226(a)(2).

Respondents wrongly state that Petitioner must be detained under the plain text of § 1225. ECF 8 at 2. They do not contend that the language of § 1226(a), excludes J.C.Z.L., and nor could they; he is indisputably "detained pending a decision on whether [he] is to be removed from the United States." 8 U.S.C. § 1226(a). Instead, Respondents cite to a small minority of cases that have held otherwise. Respondents acknowledge, however, that one of the cases concedes "that 'many courts,' both in this District and elsewhere, have held to the contrary." ECF 8 at 2, citing *Alonzo v. Noem*, 2025 WL 3208284, at *2-4 (E.D. Ca. Nov. 17, 2025); *see also Ozturk v. Lyons*, No. 1:26-CV-03484 (VC), 2026 WL 1354540 (E.D. Cal. May 14, 2026); *Zheng v. Warden*, No. 1:26-CV-03533 (EJD), 2026 WL 1354477 (E.D. Cal. May 14, 2026). As this Court has explained, "[w]hile section 1225 'authorizes the Government to detain certain aliens seeking admission into the country,' section 1226 'authorizes the Government to detain certain aliens already in the country pending the outcome of removal proceedings.'" *Lepe v. Andrews*, 801 F. Supp. 3d 1104, 1111 (E.D. Cal. 2025) (quoting *Jennings*, 583 U.S. at 289).

On September 5, 2025, the BIA issued a precedential decision that sought to vastly broaden the classes of noncitizens subject to mandatory detention under 8 U.S.C. § 1225. *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025). In *Yajure Hurtado*, the BIA held that any noncitizen who was not formally admitted into the United States—such as noncitizens who entered without inspection—are applicants for admission subject to mandatory detention under 8 U.S.C. § 1225(b)(2) regardless of how they entered and how long they have resided in the United States. *Id.* at 228.

However, the BIA's interpretation of § 1225(b)(2) in *Yajure Hurtado* has been "overwhelmingly rejected" by federal courts across the country, including in this district. *See, e.g., Kaur v. United States Dep't of Homeland Sec.*, 813 F. Supp. 3d 1167, 1173 (E.D. Cal. 2025) (collecting cases).[1] As these courts have explained, the BIA's new interpretation ignores the plain meaning of the statute. For § 1225(b)(2) to apply, "several conditions must be met—in particular, an examining immigration officer must determine that the individual is: (1) an applicant for admission; (2) seeking admission; and (3) not clearly and beyond a doubt entitled to be admitted." *Lepe*, 801 F. Supp. 3d at 1113 (citation modified). The statutory phrase "seeking admission" "means that one must be actively 'seeking' 'lawful entry.'" *Id.* (quoting *Lopez v. Benitez*, 795 F. Supp. 3d 475, 488 (S.D.N.Y. 2025)).

Moreover, the government's new interpretation "disregards the context of sections 1225 and 1226 and the broader statutory scheme." *Lepe*, 801 F. Supp. 3d at 1114. "As the Supreme Court noted in *Jennings*, section 1225 applies 'at the Nation's borders and ports of entry, where the Government must determine whether an alien seeking to enter the country is admissible.'" *Id.* (quoting *Jennings*, 583, U.S. at 287). The title of § 1225, for instance, refers to "[i]nspection by immigration officers," a "process that occurs at the border or other ports of entry." *Id.* (citing *Posos-Sanchez v. Garland*, 3 F.4th 1176, 1183 (9th Cir. 2021)).

Additionally, the government's interpretation would render a recent amendment to 8 U.S.C. § 1226(c) superfluous. As explained by this Court, the Laken Riley Act of 2025 mandated detention "for any noncitizen (i) who is inadmissible under section 1182(a)(6)(A)(i) as an 'alien present in the United States without being admitted or paroled,' *and* (ii) who 'is charged with,

[1] While the Ninth Circuit has not yet ruled on the issue, multiple circuits have already rejected the government's interpretation, including the Sixth, Eleventh, and Second Circuits. *See, e.g., Lopez-Campos v. Raycraft*, No. 25-1965, 2026 WL 1283891 (6th Cir. May 11, 2026) (rejecting *Yajure Hurtado*); *Hernandez Alvarez v. Warden, Fed. Det. Ctr. Miami*, No. 25-14065, 2026 WL 1243395, at *5 (11th Cir. May 6, 2026) (same); *Barbosa da Cunha v. Freden*, No. 25-3141-PR, 2026 WL 1146044, at *2 (2d Cir. Apr. 28, 2026); *but see Avila v. Bondi*, 170 F.4th 1128 (8th Cir. 2026); *Buenrostro-Mendez v. Bondi*, 166 F.4th 494 (5th Cir. 2026).

arrested for, convicted of, or admits' to committing certain crimes." *Id.* (citing 8 U.S.C. § 1226(c)(1)(E)) (emphasis in original). However, "[i]f every "applicant for admission . . . is already subject to mandatory detention under section 1225(b)(2)(A), as the government contends, there would have been no need for the new section 1226(c)(1)(E)." *Id.* In sum, the government's "longstanding practice, under which section 1225(b)(2)(A) would not have applied to petitioner's circumstances, is consistent with the text and statutory scheme." *Id.* at 1117.

Ever since the government initially released J.C.Z.L. nearly three years ago, he has lived in the United States and built a life here. He is not a noncitizen "seeking admission" at the border or a port of entry. Thus, the Court should reject any attempt to apply § 1225(b)(2)(A) mandatory detention in his case

D. Petitioner Is Likely to Succeed On the Merits of His Procedural and Substantive Due Process Claims

Respondents argue that Petitioner is subject to mandatory detention under § 1225(b)(2)(A) and any procedure due to him is coextensive with the statute. ECF 8 at 2. However, the case Respondents cite for this proposition, *Dep't of Homeland Sec. v. Thuraissigiam*, 591 U.S. at 139, was about a noncitizen seeking additional procedures under the credible fear interview process and not about a challenge to his re-detention. *See* 591 U.S. at 157. Numerous courts have already rejected the government's attempt to extend *Thuraissigiam* in this way. *See, e.g., Oliveros v. Kaiser*, No. 25-cv-07117-BLF, 2025 WL 2677125, at *5 (N.D. Cal. Sept. 18, 2025) (accepting Respondents' request to consider the applicability of *Thuraissigiam* and finding it does not apply); *O.P.A.M. v. Wofford*, No. 1:25-CV-01423 JLT SAB, 2025 WL 3120552 (E.D. Cal. Nov. 7, 2025), at fn 6 (noting that *Thuraissigiam* related to entry, not detention); *Padilla v. U.S. Immigr. & Customs Enf't*, 704 F. Supp. 3d 1163, 1170 (W.D. Wash. 2023) ("The Court stands unconvinced that the Supreme Court's decision in *Thuraissigiam* requires dismissal of Plaintiffs' due process claim."); *Jatta v. Clark*, No. 19-cv-2086, 2020 WL

7138006, at *2 (W.D. Wash. Dec. 5, 2020) (finding *Thuraissigiam* "inapposite" to due process challenge to detention); *Leke v. Hott*, 521 F. Supp. 3d 597, 604 (E.D. Va. 2021) ("Quite clearly, *Thuraissigiam* does not govern here, as the Supreme Court there addressed the singular issue of judicial review of credible fear determinations and did not decide the issue of an Immigration Judge's review of prolonged and indefinite detention."); *Mbalivoto v. Holt*, 527 F. Supp. 3d 838, 844–48 (E.D. Va. 2020) (similar); *see also: Hernandez v. Wofford, No. 25-cv-986-KES-CDB (HC), 2025 WL 2420390, at *3 (E.D. Cal. Aug. 21, 2025); Zheng v. Warden*, 2026 WL 1354477.

Even if this Court agrees that Petitioner is an applicant for admission, and that the government had the general authority to re-detain him, the government would still be compelled to comply with the demands of due process. When they re-detained, J.C.Z.L., they did not. *See Hernandez v. Sessions*, 872 F.3d 976, 981 (9th Cir. 2017) ("[T]he government's discretion to incarcerate non-citizens is always constrained by the requirements of due process."). As a district court in this district recently explained, "Even when a statute allows the government to arrest and detain an individual, a protected liberty interest under the Due Process Clause may entitle the individual to procedural protections not found in the statute." *Rodriguez v. Kaiser*, No. 1:25-cv-01111-KES-SAB (HC), 2025 WL 2855193, at *5 (E.D. Cal. Oct. 8, 2025) (citing *Young v. Harper*, 520 U.S. 143, 147-49 (1997); *Gagnon v. Scarpelli*, 411 U.S. 778, 782 (1973); *Morrissey v. Brewer*, 408 U.S. 471, 482 (1972)).

In their reply, Respondents do not meaningfully challenge J.C.Z.L.'s claim that he has a protected liberty interest. Respondents simply state that "Petitioner does not have a liberty interest in remaining out of custody during the pendency of removal proceedings because of [his] gang-related background and criminal history." Resp. Opp., ECF 8 at 3. As noted *supra*, the unreliability of the information in the DHS file should cause this Court to disregard Respondent's allegations of gang membership and criminal convictions. Yet even if this Court

were to accept those allegations, Respondents misconstrue their effect on his liberty interest. Even an intervening criminal *conviction*—not at issue in the present case—does not excuse the government from its duty to justify its actions before depriving a person of their freedom. *See Tinoco v. Noem*, 818 F. Supp. 3d 1141, 1152 (E.D. Cal. 2025) ("Although Respondents highlight in their opposition that Petitioner repeatedly violated the terms of his release and was arrested for driving under the influence, no neutral arbiter under section 1226 has determined whether those facts show that Petitioner is a flight risk or danger to the community.") (internal citation omitted).

In response to the Court's July 13, 2026, Order (Dkt. 7), Respondents attempt to distinguish the instant case from *Alauddin v. Chestnut*, No. 1:26-CV-03541 (AMO), 2026 WL 1346863 (E.D. Cal. May 14, 2026); *Ozturk v. Lyons*, No. 1:26-CV-03484 (VC), 2026 WL 1354540 (E.D. Cal. May 14, 2026); *Zheng v. Warden*, No. 1:26-CV-03533 (EJD), 2026 WL 1354477 (E.D. Cal. May 14, 2026) by saying "as Petitioner's gang affiliation and criminal conduct establishes he is a danger and flight risk, and an investigation into his background warranted his arrest and detention. The other petitioners seemingly were arrested following a traffic violation and had no criminal history or conduct." All cases, however, were decided on procedural due process grounds, and their holdings should apply equally to J.C.Z.L. This Court and others have decided in petitioners' favor based on due process grounds even when criminal histories were present. *See Rodriguez Diaz v. Kaiser*, No. 25-CV-05071-TLT, 2025 WL 3011852 (N.D. Cal. Sept. 16, 2025);*Vishal v. Chestnut,* 811 F. Supp. 3d 1179 (E.D. Cal. 2025); *Claros v. Albarran,* 811 F. Supp. 3d 1062 (N.D. Cal. 2025). Like in the cases above, Petitioner should have received notice and an opportunity to contest the false allegations the government has levelled against him. The government has provided no valid reason why Petitioner is not entitled to such process.

J.C.Z.L. maintains that his recent detention without notice, and without a pre-deprivation hearing or opportunity to contest the reasons or need for his detention, violates the procedural due process guarantee of the Fifth Amendment to the U.S. Constitution. As stated in *Castillo Gomez*, "even if the Government had statutory authority to detain him – which it does not – the Court holds . . . that under the *Mathews* factors, notice, an opportunity to be heard, and an individualized custody determination prior to re-detention is required by the Due Process Clause of the United State Constitution." WL 1229590, at *6; *see also Gregorio Ordonez v. Bondi*, 2025 WL 3852444, at *9 ("Based on this review of the *Mathews* factors, the Court should find that petitioner has a protected liberty interest in freedom from detention, and that due process requires that petitioner receive a hearing before an immigration judge before he can be re-detained."). Numerous cases in this Court have applied *Mathews*, including *Alauddin v. Chestnut*, 2026 WL 1346863, *Ozturk v. Lyons*, 2026 WL 1354540, and *Zheng v. Warden*, 2026 WL 1354477.

Additionally, Petitioner maintains that his detention also violates the substantive due process guarantee of the Fifth Amendment, as there is no credible evidence that he poses a danger to the community or a significant risk of flight, and therefore his civil immigration detention "does not bear a reasonable relation to the statutory purposes motivating it." *Valencia Zapata v. Kaiser*, 801 F. Supp. 3d 919, 939 (N.D. Cal. 2025) (citing *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001)). Respondents do not meaningfully address this argument.

E. The Untranslated Document Referred to as "Venezuelan Supreme Tribunal Court Document" Has No Legal Effect on Petitioner's Arguments.

Respondents have stated that J.C.Z.L. does not have a liberty interest because of unsubstantiated allegations against him about prior circumstances rendering him a danger. They attach to their opposition a lengthy untranslated document referred to as "Venezuelan Supreme Tribunal Court Document." DO Decl., Exh. 4. This document has no legal effect on Petitioner's

arguments because he should have received a hearing on this before he was detained. Respondents should be compelled to prove that Petitioner is a danger before arresting him. There has been nothing since his original release from custody to indicate that he is a danger. This highlights that Petitioner should have been given a pre-deprivation hearing to address Respondents' unsubstantiated allegation and determine whether a danger to the community exists, and no such hearing occurred. The warrantless arrest, with no notice and no pre-deprivation hearing, should never have occurred; and the proper remedy is immediate release.

In addition to having no legal effect on Petitioner's arguments, the document is unreliable. The untranslated Spanish-language document is purported to state that "Petitioner is known to be a member of the Venezuelan gang ...." DO Decl. at p. 2 ¶ 7. This information is given by "general summary" because Spanish is DO Abad's first language and "DHS is working to obtain an official translation for the Immigration Court ...." *Id.* at pp. 2-3 ¶¶ 7-8; *see also* Resp. Opp., ECF 8 at 1-2. First, the presentation of evidence without a translation is improper and this Court should decline to consider the document. *See, e.g., Afifeh v. Ahmadabadi,* No.: 2:22-cv-00928-SB-AFM, 2022 WL 1060638, at *5 (C.D. Cal April 1, 2022) ("Many of the exhibits are almost entirely in Farsi, with no English translation provided. Accordingly, the Court need not—and will not—consider them."); *Hyphy Music, Inc. Sena,* No. 1:21-cv-00216-JLT-HBK, 2025 WL 842893, at *8 (E.D. Cal Mar, 18, 2025) (declining to consider submitted video in Spanish without a transcript or certified translation). Second, there is not even a description of the source of the document, which is listed as one of the documents in "Petitioner's case file and records maintained by DHS...." DO Decl. ECF 8-1 at p. 2 line 5 ¶ 4. Per E.D. Cal rule 142(a)(3), as the document is not authenticated, it should be disregarded. Third, even if the Spanish-language document were from Venezuela, which is not at all clear, it does not mean he is a gang member or criminal. The basis of J.C.Z.L.'s asylum claim was persecution by the Venezuelan

government, which included false accusations and prosecutions. Petitioner is a political activist who is seeking asylum because he was detained, falsely charged with criminal conduct, and tortured because of his activities against the Venezuelan government. Declaration of Tala Hartsough (ECF 4). at ¶ 6; *Id.*, Exh. 1 (Declaration of Petitioner's Partner D.C.M.) at ¶ 8.

F. Immediate release is the most appropriate relief to remedy the government's due process violation.

Respondents request that rather than immediate release, Petitioner seek a bond hearing while detained. ECF 8 at 4. However, as a district court judge of the Central District of California recently explained, "the baseline requirement is a 'hearing *before* the State deprives a person of liberty,' not *after*." *Rodriguez Flores*, 2025 WL 2684181, at *4 (quoting *Zinermon v. Burch*, 494 U.S. 113, 127 (1990)) (emphasis added). A recent decision from this district concurred, holding, "On balance, the *Mathews* factors show that petitioner is entitled to a bond hearing, which should have been provided *before* petitioner was detained." *F.M.V. v. Wofford*, No. 1:25-cv-01381-KES-SAB (HC), 2025 WL 3083934, at *6 (E.D. Cal. Nov. 4, 2025) (emphasis added). The court added, "[T]he root requirement of the Due Process Clause is that an individual be given an opportunity for a hearing *before* he is deprived of any significant protected interest." *Id.* at *6 (quoting *Cleveland Bd. of Educ. v. Loudermill*, 470 U.S. 532, 542 (1985) & *Boddie v. Connecticut*, 401 U.S. 371, 379 (1971)) (internal quotation marks omitted). As such, both courts ordered, as a remedy to the due process violation, for the petitioner to be immediately released. *See Rodriguez-Flores*, 2025 WL 2684181, at *4; *F.V.M.*, 2025 WL 3083934, at *7. As the court in *F.V.M.* explained, "Petitioner's immediate release is required to return him to the status quo ante—'the last uncontested status which preceded the pending controversy.'" 2025 WL 3083934, at *7; *see also Pinchi*, 2025 WL 2084921, at *3 ("Petitioner's immediate release is required to return her to the status quo. The status quo refers to the last uncontested status which preceded the pending controversy. That is the moment prior to the

Petitioner's likely illegal detention.") (internal quotation and citations omitted); *Kuzmenko v. Phillips*, No. 25-CV-00663, 2025 WL 779743, at *2 (E.D. Cal. Mar. 10, 2025) (granting a temporary restraining order requiring immediate release of the petitioner back to home confinement from custody, as a restoration of the status quo). Thus, when faced when such due process violations, courts have consistently ordered for release rather than a post-deprivation bond hearing while the petitioner remains in custody. *See Meza Martinez*, Case No. 5:25- cv-02787-CV, at 11; ECF 4 at 17 (collecting cases).

In response to the Court's July 13, 2026, Order (Dkt. 7), Petitioner does not oppose the Court converting the motion for temporary restraining order into a motion for preliminary injunction. Petitioner also does not oppose the court ruling on the underlying habeas petition in its entirety.

CONCLUSION

For these reasons and those articulated in his earlier filings, J.C.Z.L. urges the Court to grant him injunctive relief and issue a writ of habeas corpus ordering Respondents to immediately release J.C.Z.L. from their physical custody, and grant the other relief requested in his application for a TRO.

Dated: July 16, 2026

Respectfully Submitted,

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