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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

ENRIQUE ENRIQUEZ-GUERRA,

Petitioner,

v.

MARKWAYNE MULLIN, Secretary of the Department of Homeland Security, TODD BLANCHE, Acting Attorney General, TODD M. LYONS, Acting Director, Immigration and Customs Enforcement, JESUS ROCHA, Acting Field Office Director, San Diego Field Office, CHRISTOPHER LAROSE, Warden at Otay Mesa Detention Center,

Respondents.

CIVIL CASE NO.:

'26CV4510 BAS JLB

Petition for Writ of Habeas Corpus

[28 U.S.C. § 2241]

[1] Federal Defenders of San Diego, Inc., is filing the instant petition with provisional appointment under Chief Judge Order No. 134.

INTRODUCTION

Enrique Enriquez-Guerra is a Cuban national who entered the United States in 2022. In October of 2025, the government dismissed the removal case against him in front of an immigration judge. It then immediately detained him as he left immigration court and issued an expedited removal order against him. Since then, he has been moved around to different immigration detention centers in different states. He appealed the immigration judge's dismissal order to the BIA, and that appeal remains pending. There is no separate appeal of the expedited removal order, which thus appears to be final. Mr. Enriquez is now at Otay Mesa Detention Center.

This petition raises two claims that have newly arisen in his case:

(1) Because Mr. Enriquez has been detained more than six months on what appears to be a final removal order to Cuba—a non-cooperative country—Mr. Enriquez's detention violates 8 U.S.C. § 1231(a), *Zadvydas v. Davis*, 533 U.S. 678 (2001), and the Fifth Amendment. *See, e.g.*, *Castro-Napoles v. Noem*, No. 26-cv-3212-RFL, 2026 WL 1720963 (S.D. Cal. June 15, 2026); *Calviac-Diaz v. Mullin*, No. 26-cv-3988-RSH-AHG, 2026 WL 2187697 (S.D. Cal. July 29, 2026); *Prado v. Warden*, No. 26-cv-4738-DJC-CSK, 2026 WL 2262335 (E.D. Cal. Aug. 5, 2026); *Gaceran-Jimenez v. Marin*, No. 26-cv-1973-BFM, 2026 WL 2262177, *4 (C.D. Cal. Aug. 5, 2026); *Coke v. Bondi*, No. C26-71, 2026 WL 221514, *2 (W.D. Wash. Jan. 28, 2026); *Suarez-Ramirez v. Bondi*, 2026 WL 115020, *2 (D. Nev. Jan 15, 2026); *Pena-Gil v. Lyons*, 2025 WL 3268333, *1–*4 (D. Colo. Nov. 24, 2025) (all granting Cuban *Zadvydas* petitions).

(2) Third-country removal due process violations: This Court should enjoin ICE from removing Mr. Enriquez to Mexico or another a third country without providing an opportunity to assert fear of persecution or torture before an immigration judge. *See, e.g.*, *Nguyen v. Scott*, 796 F. Supp. 3d 703, 727–39 (W.D.

Wash. 2025); *Azzo v. Noem*, No. 25-cv-3122-RBM-BJW, 2025 WL 3535208, *6–*8 (S.D. Cal. Dec. 10, 2025) (granting such injunctions).

STATEMENT OF FACTS

I. Mr. Enriquez is arrested by ICE following an immigration court hearing, and given an expedited removal order that appears final, yet ICE has not been able to remove Mr. Enriquez to Cuba.

Enrique Enriquez-Guerra is a Cuban national who came to the United States in 2022. Exhibit A ¶ 1 (declaration of Mr. Enriquez). He applied for asylum from Cuba, worked, and was placed in removal proceedings before an immigration judge. *Id.* ¶¶ 2–3; *see also* Exhibit B (notice to appear). Over three years later, he attended an immigration court hearing on October 16, 2025, and on that day, the government moved to dismiss its removal case against him. Exhibit A ¶ 3. When he left the immigration courtroom, the government detained him and issued an expedited removal order against him. *Id.*; Exhibit C (expedited removal order); *but see* 8 U.S.C. § 1225(b)(A)(iii)(II) (limiting the application of the expedited removal process to noncitizens present in the United States for two years or fewer); *African Communities Together v. Lyons*, __ F. Supp. 3d __, 2026 WL 1382944 (S.D.N.Y. 2026) (noting ICE has recently taken inconsistent positions as to whether it has a policy of arresting noncitizens at their court hearings).

Mr. Enriquez appealed the immigration judge's grant of the government's motion to dismiss its standard removal proceedings against him to the Bureau of Immigration Appeals in October 2025. Exhibit A ¶ 4. As of the filing of this petition, the BIA had still not set a briefing schedule on that appeal.

On a search of pending appeals in PACER and information and belief, it does not appear that Mr. Enriquez filed any appeal of the expedited removal order. *See also Mendoza-Linares v. Garland*, 51 F.4th 1146 (9th Cir. 2022)

(noting limited appellate jurisdiction over expedited removal proceedings). That removal order thus appears to be final.

In the meantime, Mr. Enriquez was moved between detention centers within Florida. *Id.* ¶ 5. Mr. Enriquez sought to receive a bond hearing while his BIA appeal was pending. After that was denied, he filed a habeas petition requesting a bond hearing under 8 U.S.C. § 1226 in the Southern District of Florida. *See Enriquez-Guerra v. Garrett*, No. 26-60766-CIV-SINGHAL (S.D. Fl.). That petition was granted in May 2026 and Mr. Enriquez was ordered to receive a bond hearing. *Id.* ECF No. 14. An immigration judge denied him bond because he had "no relief pending before the Court" and his "NTA has been dismissed (on appeal) (no future hearing to appear at)," and he lacked proof of property ownership or savings, did not prove he had a fixed address, and because he had several traffic infractions. *See* Exhibit D.

Following a series of further transfers between Florida and Texas immigration detention facilities, Mr. Enriquez is now at the Otay Mesa Detention Center. Exhibit A ¶ 5. He has not spoken to any ICE officers and is personally unsure as to what is happening in his case. *Id.* ¶ 6. He is afraid of returning to Cuba, and he does not wish to go to Mexico. *Id.* ¶ 7.

II. The repatriation agreement with Cuba is new and Cuba is often non-cooperative under it.

Prior to 2017, there was no repatriation agreement between the United States and Cuba. *Clark v. Martinez*, 543 U.S. 371, 386 (2005). On January 12, 2017, the United States and Cuba signed a joint statement ("2017 Joint Statement") by which Cuba agreed to the repatriation of some Cuban nationals. *Cuba (17-112) – Joint Statement Concerning Normalization of Migration Procedures*, Jan. 12, 2017, available at https://www.state.gov/17-112/. The 2017

Joint Statement required Cuba to accept some Cuban nationals but allowed it to use its discretion to accept others on a case-by-case basis.

Despite the 2017 Joint Statement, a 2019 report by the Office of Inspector General classified Cuba as an "uncooperative country" in 2017, 2018, and 2019 based on its failure to provide travel documents on a timely basis. Department of Homeland Security, Office of Inspector General, Report No. OIG-19-28, *ICE Faces Barriers in Timely Repatriation of Detained Aliens* (Mar. 11, 2019), available at https://www.oig.dhs.gov/sites/default/files/assets/2019-03/OIG-19-28-Mar19.pdf at pages 6-7, 10, 29. In May of 2018, Cuba was one of nine countries with the uncooperative categorization. *Id.* at 10.

Based on the facts of Mr. Enriquez's individual case, it is evident that ICE has not obtained travel documents from Cuba.

III. The government is carrying out deportations to third countries without providing sufficient notice and opportunity to be heard.

When immigrants cannot be removed to their home country—including Cuban immigrants—ICE has begun deporting those individuals to third countries without adequate notice or a hearing.

On July 9, 2025, ICE rescinded previous guidance meant to give immigrants a "'meaningful opportunity' to assert claims for protection under the Convention Against Torture (CAT) before initiating removal to a third country" like the ones just described. Exhibit E.

Under the new guidance, ICE may remove any immigrant to a third country "without the need for further procedures," as long as—in the view of the State Department—the United States has received "credible" "assurances" from that country that deportees will not be persecuted or tortured. *Id.* at 1. If a country fails to credibly promise not to persecute or torture releasees, ICE may still remove immigrants there with minimal notice. *Id.* Ordinarily, ICE must provide 24 hours' notice. But "[i]n exigent circumstances," a removal may take place in as little as

six hours, "as long as the alien is provided reasonably means and opportunity to speak with an attorney prior to the removal." *Id.*

Upon serving notice, ICE "will not affirmatively ask whether the alien is afraid of being removed to the country of removal." *Id.* (emphasis original). If the noncitizen "does not affirmatively state a fear of persecution or torture if removed to the country of removal listed on the Notice of Removal within 24 hours, [ICE] may proceed with removal to the country identified on the notice." *Id.* at 2. If the noncitizen "does affirmatively state a fear if removed to the country of removal" then ICE will refer the case to U.S. Citizenship and Immigration Services ("USCIS") for a screening for eligibility for withholding of removal and protection under the Convention Against Torture ("CAT"). *Id.* at 2. "USCIS will generally screen within 24 hours." *Id.* If USCIS determines that the noncitizen does not meet the standard, the individual will be removed. *Id.* If USCIS determines that the noncitizen has met the standard, then the policy directs ICE to either move to reopen removal proceedings "for the sole purpose of determining eligibility for [withholding of removal protection] and CAT" or designate another country for removal. *Id.*

IV. The government's third-country removals of Cubans to Mexico requires noncitizens' voluntary consent.

In the last year, over 4,000 Cubans have been deported to Mexico. *See* Alcira Silva Hava et al., *"Casting Us Aside to Die": Cuban and Other Third-Country Nationals Deported from the US to Mexico*, Human Rights Watch (May 2026).[2] However, "the consensus among the federal courts of this Circuit is that" Mexico's current policy is to "refuse[] to accept citizens of countries other than Mexico who do not consent to removal to Mexico." *Gaceran-Jimenez*, 2026 WL

[2] Available at https://www.hrw.org/report/2026/05/27/casting-us-aside-to-die/cuban-and-other-third-country-nationals-deported-from-the.

2262177 at *3. Mr. Enriquez has not and will not consent to his removal to a third country, including Mexico. Exhibit A ¶ 8.

CLAIMS FOR RELIEF

I. Claim 1: Mr. Enriquez's detention violates *Zadvydas* and 8 U.S.C. § 1231.

A. Legal background

In *Zadvydas v. Davis*, 533 U.S. 678 (2001), the Supreme Court considered a problem affecting people like Mr. Enriquez: Federal law requires ICE to detain an immigrant during the "removal period," which typically spans the first 90 days after the immigrant is ordered removed. 8 U.S.C. § 1231(a)(1)-(2). After that 90-day removal period expires, detention becomes discretionary—ICE may detain the migrant while continuing to try to remove them. *Id.* § 1231(a)(6). Ordinarily, this scheme would not lead to excessive detention, as removal happens within days or weeks. But some detainees cannot be removed quickly. Perhaps their removal "simply require[s] more time for processing," or they are "ordered removed to countries with whom the United States does not have a repatriation agreement," or their countries "refuse to take them," or they are "effectively 'stateless' because of their race and/or place of birth." *Kim Ho Ma v. Ashcroft*, 257 F.3d 1095, 1104 (9th Cir. 2001). In these and other circumstances, detained immigrants can find themselves trapped in detention for months, years, decades, or even the rest of their lives. If federal law were understood to allow for "indefinite, perhaps permanent, detention," it would pose "a serious constitutional threat." *Zadvydas*, 533 U.S. at 699. In *Zadvydas*, the Supreme Court avoided the constitutional concern by interpreting § 1231(a)(6) to incorporate implicit limits. *Id.* at 689.

Zadvydas held that § 1231(a)(6) presumptively permits the government to detain an immigrant for 180 days after his or her removal order becomes final. After those 180 days have passed, the immigrant must be released unless his or

her removal is reasonably foreseeable. *Zadvydas*, 533 U.S. at 701. After six months have passed, the petitioner must only make a prima facie case for relief—there is "good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future." *Id.* Then the burden shifts to "the Government [to] respond with evidence sufficient to rebut that showing." *Id.* Using this framework, Mr. Enriquez can make all the threshold showings needed to shift the burden to the government.

B. The six-month grace period has expired.

Although Mr. Enriquez's case is in an unusual procedural posture, his expedited removal order does appear to have been final since October 2025, and thus the six-month grace period has apparently ended. The *Zadvydas* grace period is linked to the date the final order of removal is issued. It lasts for "*six months* after a final order of removal—that is, *three months* after the statutory removal period has ended." *Kim Ho Ma v. Ashcroft*, 257 F.3d 1095, 1102 n.5 (9th Cir. 2001).

Here, Mr. Enriquez's expedited removal order was issued on October 16, 2025. Exhibit C. Accordingly, his 90-day removal period began then. 8 U.S.C. § 1231(a)(1)(B). The *Zadvydas* grace period thus expired in April 2025.

C. The history of Cuba being uncooperative with repatriation provides good reason to believe that Mr. Enriquez will not likely be removed in the reasonably foreseeable future.

Because the six-month grace period has passed, this Court must evaluate Mr. Enriquez's *Zadvydas* claim using the burden-shifting framework. At the first stage of the framework, Mr. Enriquez must "provide[] good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future." *Zadvydas*, 533 U.S. at 701. This standard can be broken down into three parts.

"Good reason to believe." The "good reason to believe" standard is a relatively forgiving one. "A petitioner need not establish that there exists no

possibility of removal." *Freeman v. Watkins*, No. CV B:09-160, 2009 WL 10714999, at *3 (S.D. Tex. Dec. 22, 2009). Nor does "'[g]ood reason to believe' . . . place a burden upon the detainee to demonstrate no reasonably foreseeable, significant likelihood of removal or show that his detention is indefinite; it is something less than that." *Rual v. Barr*, No. 6:20-CV-06215 EAW, 2020 WL 3972319, at *3 (W.D.N.Y. July 14, 2020) (quoting *Senor v. Barr*, 401 F. Supp. 3d 420, 430 (W.D.N.Y. 2019)). In short, the standard means what it says: Petitioners need only give a "good reason"—not prove anything to a certainty.

"Significant likelihood of removal." This component focuses on <u>whether</u> Mr. Enriquez will likely be removed: Continued detention is permissible only if it is "significant[ly] like[ly]" that ICE will be able to remove him. *Zadvydas*, 533 U.S. at 701. This inquiry targets "not only the *existence* of untapped possibilities, but also [the] probability of *success* in such possibilities." *Elashi v. Sabol*, 714 F. Supp. 2d 502, 506 (M.D. Pa. 2010) (second emphasis added). In other words, even if "there remains *some* possibility of removal," a petitioner can still meet its burden if there is good reason to believe that successful removal is not significantly likely. *Kacanic v. Elwood*, No. CIV.A. 02-8019, 2002 WL 31520362, at *4 (E.D. Pa. Nov. 8, 2002) (emphasis added).

"In the reasonably foreseeable future." This component of the test focuses on <u>when</u> Mr. Enriquez will likely be removed: Continued detention is permissible only if removal is likely to happen "in the reasonably foreseeable future." *Zadvydas*, 533 U.S. at 701. This inquiry places a time limit on ICE's removal efforts. If the Court has "no idea of when it might reasonably expect [Petitioner] to be repatriated, this Court certainly cannot conclude that his removal is likely to occur—or even that it might occur—in the reasonably foreseeable future." *Palma v. Gillis*, No. 5:19-CV-112-DCB-MTP, 2020 WL 4880158, at *3 (S.D. Miss. July 7, 2020), *report and recommendation adopted*, 2020 WL 4876859 (S.D. Miss. Aug. 19, 2020) (quoting *Singh v. Whitaker*, 362 F. Supp. 3d

93, 102 (W.D.N.Y. 2019)). Thus, even if this Court concludes that Mr. Enriquez "would *eventually* receive" a travel document, he can still meet his burden by giving good reason to anticipate sufficiently lengthy delays. *Younes v. Lynch*, 2016 WL 6679830, at *2 (E.D. Mich. Nov. 14, 2016).

Mr. Enriquez satisfies this standard for two reasons.

First, as explained above, the 2017 Joint Statement between the United States and Cuba gives Cuba the discretion to accept individuals on a case-by-case basis. Even following the 2017 Joint Statement, the United States has categorized Cuba as uncooperative in providing travel documents in a timely manner.

Second, Mr. Enriquez's experience bears this out. ICE has now had since October 2025 to remove him, but it has not made efforts to do so. It has not tried to remove him to the third country Mexico, but if it did, he would not consent. Exhibit A ¶ 7. This does not alter the *Zadvydas* analysis: "If Mexico will not accept those who do not willingly agree to be removed, then, quite simply, Petitioner does not meet Mexico's criteria for removal to that country." *Gaceran-Jimenez*, 2026 WL 226177 at *4.

Thus, Mr. Enriquez has met his initial burden, and the burden shifts to the government. Unless the government can prove a "significant likelihood of removal in the reasonably foreseeable future," Mr. Enriquez must be released. *Zadvydas*, 533 U.S. at 701.

II. Claim 2: ICE may not remove Mr. Enriquez to a third country without adequate notice and an opportunity to be heard.

In addition to unlawfully detaining him and the failure to comply with regulations and statute, ICE's policies threaten his removal to a third country without adequate notice and an opportunity to be heard. These policies violate the Fifth Amendment, the Convention Against Torture, and implementing regulations.

A. Legal background

U.S. law enshrines protections against dangerous and life-threatening removal decisions. By statute, the government is prohibited from removing an immigrant to any third country where they may be persecuted or tortured, a form of protection known as withholding of removal. *See* 8 U.S.C. § 1231(b)(3)(A). The government "may not remove [a noncitizen] to a country if the Attorney General decides that the [noncitizen's] life or freedom would be threatened in that country because of the [noncitizen's] race, religion, nationality, membership in a particular social group, or political opinion." *Id.*; *see also* 8 C.F.R. §§ 208.16, 1208.16. Withholding of removal is a mandatory protection.

Similarly, Congress codified protections enshrined in the CAT prohibiting the government from removing a person to a country where they would be tortured. *See* FARRA 2681-822 (codified as 8 U.S.C. § 1231 note) ("It shall be the policy of the United States not to expel, extradite, or otherwise effect the involuntary return of any person to a country in which there are substantial grounds for believing the person would be in danger of being subjected to torture, regardless of whether the person is physically present in the United States."); 28 C.F.R. § 200.1; *id.* §§ 208.16-208.18, 1208.16-1208.18. CAT protection is also mandatory.

To comport with the requirements of due process, the government must provide notice of the third country removal and an opportunity to respond. Due process requires "written notice of the country being designated" and "the statutory basis for the designation, i.e., the applicable subsection of § 1231(b)(2)." *Aden v. Nielsen*, 409 F. Supp. 3d 998, 1019 (W.D. Wash. 2019); *accord D.V.D. v. U.S. Dep't of Homeland Sec.*, No. 25-cv-10676-BEM, 2025 WL 1453640, at *1 (D. Mass. May 21, 2025); *Andriasian v. INS*, 180 F.3d 1033, 1041 (9th Cir. 1999).

The government must also "ask the noncitizen whether he or she fears persecution or harm upon removal to the designated country and memorialize in writing the noncitizen's response. This requirement ensures DHS will obtain the necessary information from the noncitizen to comply with section 1231(b)(3) and avoids [a dispute about what the officer and noncitizen said]." *Aden*, 409 F. Supp. 3d at 1019. "Failing to notify individuals who are subject to deportation that they have the right to apply for asylum in the United States and for withholding of deportation to the country to which they will be deported violates both INS regulations and the constitutional right to due process." *Andriasian*, 180 F.3d at 1041.

If the noncitizen claims fear, measures must be taken to ensure that the noncitizen can seek asylum, withholding, and relief under CAT before an immigration judge in reopened removal proceedings. The amount and type of notice must be "sufficient" to ensure that "given [a noncitizen's] capacities and circumstances, he would have a reasonable opportunity to raise and pursue his claim for withholding of deportation." *Aden*, 409 F. Supp. 3d at 1009 (citing *Mathews v. Eldridge*, 424 U.S. 319, 349 (1976) and *Kossov v. I.N.S.*, 132 F.3d 405, 408 (7th Cir. 1998)); *cf. D.V.D.*, 2025 WL 1453640, at *1 (requiring the government to move to reopen the noncitizen's immigration proceedings if the individual demonstrates "reasonable fear" and to provide "a meaningful opportunity, and a minimum of fifteen days, for the non-citizen to seek reopening of their immigration proceedings" if the noncitizen is found to not have demonstrated "reasonable fear"); *Aden*, 409 F. Supp. 3d at 1019 (requiring notice and time for a respondent to file a motion to reopen and seek relief).

"[L]ast minute" notice of the country of removal will not suffice, *Andriasian*, 180 F.3d at 1041; *accord Najjar v. Lunch*, 630 Fed. App'x 724 (9th Cir. 2016), and for good reason: To have a meaningful opportunity to apply for fear-based protection from removal, immigrants must have time to prepare and

present relevant arguments and evidence. Merely telling a person where they may be sent, without giving them a chance to look into country conditions, does not give them a meaningful chance to determine whether and why they have a credible fear.

B. The June 6, 2025 memo's removal policies violate the Fifth Amendment, 8 U.S.C. § 1231, the Conviction Against Torture, and Implementing Regulations.

The policies in the June 6, 2025 memo do not adhere to these requirements. First, under the policy, ICE need not give immigrants *any* notice or *any* opportunity to be heard before removing them to a country that—in the State Department's estimation—has provided "credible" "assurances" against persecution and torture. Exh. A. By depriving immigrants of any chance to challenge the State Department's view, this policy violates "[t]he essence of due process," "the requirement that a person in jeopardy of serious loss be given notice of the case against him and opportunity to meet it." *Mathews v. Eldridge*, 424 U.S. 319, 348 (1976) (cleaned up).

Second, even when the government has obtained no credible assurances against persecution and torture, the government can still remove the person with between 6 and 24 hours' notice, depending on the circumstances. Exh. A. Practically speaking, there is not nearly enough time for a detained person to assess their risk in the third country and martial evidence to support any credible fear—let alone a chance to file a motion to reopen with an IJ. An immigrant may know nothing about a third country, like Eswatini or South Sudan, when they are scheduled for removal there. Yet if given the opportunity to investigate conditions, immigrants would find credible reasons to fear persecution or torture—like patterns of keeping deportees indefinitely and without charge in solitary confinement or extreme instability raising a high likelihood of death—in many of the third countries that have agreed to removal thus far. Due process requires an adequate chance to identify and raise these threats to health and life.

This Court must prohibit the government from removing Mr. Enriquez without these due process safeguards.

III. This Court must hold an evidentiary hearing on any disputed facts.

Resolution of a prolonged-detention habeas petition may require an evidentiary hearing. *Owino v. Napolitano*, 575 F.3d 952, 956 (9th Cir. 2009). Mr. Enriquez hereby requests such a hearing on any material, disputed facts.

IV. Prayer for relief

For the foregoing reasons, Petitioner respectfully requests that this Court:

1. Order Respondents to immediately release Petitioner from custody;
2. Enjoin Respondents from re-detaining Petitioner under 8 U.S.C. § 1231(a)(6) unless and until Respondents obtain a travel document for his removal;
3. Enjoin Respondents from re-detaining Petitioner without first following all procedures set forth in 8 C.F.R. §§ 241.4(*l*), 241.13(i), and any other applicable statutory and regulatory procedures;
4. Enjoin Respondents from removing Petitioner to any country other than Cuba, without first following the consecutive procedures of 8 U.S.C. § 1231(b)(2);
5. Enjoin Respondents from removing Petitioner to any country other than Cuba, unless they provide the following process, *see D.V.D. v. U.S. Dep't of Homeland Sec.*, No. CV 25-10676-BEM, 2025 WL 1453640, at *1 (D. Mass. May 21, 2025):
    a. written notice to both Petitioner and Petitioner's counsel in a language Petitioner can understand;
    b. a meaningful opportunity, and a minimum of ten days, to raise a fear-based claim for CAT protection prior to removal;

c. if Petitioner is found to have demonstrated "reasonable fear" of removal to the country, Respondents must move to reopen Petitioner's immigration proceedings;

d. if Petitioner is not found to have demonstrated a "reasonable fear" of removal to the country, a meaningful opportunity, and a minimum of fifteen days, for the Petitioner to seek reopening of his immigration proceedings.

6. Order all other relief that the Court deems just and proper.

Respectfully submitted,

Dated: August 6, 2026

s/ Jessie Agatstein

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PROOF OF SERVICE

I, the undersigned, will cause the attached petition for a writ of habeas corpus to be emailed to the U.S. Attorney's Office for the Southern District of California at USACAS.Habeas2241@usdoj.gov when I receive the court-stamped copy.

Dated: August 6, 2026

s/ Jessie Agatstein

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