UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

M-A-C-C-,

Petitioner,

v.

JULIO HERNANDEZ, Seattle Field Office Director, Immigration and Customs Enforcement and Removal Operations; TODD LYONS, Acting Director of U.S. Immigration Customs Enforcement; KRISTI NOEM, Secretary, U.S. Department of Homeland Security; PAMELA BONDI, Attorney General of the United States; BRUCE SCOTT, Warden, Northwest ICE Processing Center; and EOIR.

Respondents.

Case No.:

Agency No. A-file No. XXX-XXX-563

PETITION FOR WRIT OF HABEAS CORPUS PURSUANT TO 28 U.S.C. § 2241

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INTRODUCTION

1. On the morning of November 29, 2025, Petitioner, M-A-C-C- left home to drive to work, as he routinely did. He was not the subject of a criminal investigation. He committed no traffic violation. Yet, while he was lawfully obeying all the traffic laws, two unmarked ICE vehicles began following him closely for several minutes before activating their lights to stop him. The ICE agents who stopped him did not present a warrant and did not explain the reason for the stop. They asked only whether he had been born in the United States and whether he possessed employment authorization. Within minutes, he was ordered out of his vehicle and placed in handcuffs. The agents did not ask about his residence, employment, family ties, prior compliance with immigration authorities, or whether he was likely to flee. He made no attempt to flee and complied with all instructions.

2. DHS agents rapidly transported him out of the District of Oregon to the immigration detention center in Tacoma, Washington, where they have purported to hold him in "mandatory" detention pursuant to a novel incorrect interpretation of the Immigration and Nationality Act's detention authorities.

3. Petitioner submits this petition for writ of habeas corpus to seek enforcement of his rights as a member of the Bond Denial Class certified in *Rodriguez Vazquez v. Boston*, No. No. 3:25-cv-05240-TMC,--- F. Supp. 3d ---, 2025 WL 2782499 (W.D. Wash. Sept. 30, 2025) and *Maldonado v. Santacruz*, No. 5:25-cv-01873-SSS-BFM, --- F. Supp. 3d ---, 2025 WL 2670875. Petitioner is in executive custody and faces unlawful detention without consideration of release on bond because, in a brazen disregard for the rule of law, both the

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Department of Homeland Security ("DHS") and the Executive Office for Immigration Review ("EOIR") have refused to comply with the declaratory judgments issued on behalf of the certified classes in both *Maldonado Bautista* and *Rodriguez Vazquez.*

4. On May 2, 2025, this Court certified the Bond Denial Class in *Rodriguez Vazquez*. *See* 349 F.R.D. 333, 365 (W.D. Wash. May 2, 2025) (certifying Plaintiffs-Petitioners' proposed Bond Denial Class, identical to that in *Maldonado Bautista* but limited to detainees held at the Northwest ICE Processing Center). On September 30, 2025, the Court granted partial summary judgment to the *Rodriguez Vazquez* plaintiffs, and acknowledged an entitlement to consideration of release on bond for individuals who (1) have entered or will enter the United States without inspection; (2) are not apprehended by immigration officials upon entry, and (3) are not or will not be subject to the detention authority articulated at 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231 at the time the noncitizen is scheduled for or requests a bond hearing. *Rodriguez Vazquez*, 2025 WL 2782499, at *86-87 (W.D. Wash. Sept. 30, 2025).

5. Similarly, on November 20, 2025, the U.S. District Court for the Central District of California granted partial summary judgment in *Maldonado Bautista*. Shortly thereafter, on November 25, 2025, the court certified a nationwide class and extended declaratory judgment to the certified class. *Maldonado Bautista v. Santacruz*, 2025 WL 3289861, at *11 (C.D. Cal. Nov. 20, 2025) (order granting partial summary judgment to named Plaintiffs-Petitioners); *Maldonado Bautista v. Santacruz*, 2025 WL 3288403, at *9 (C.D. Cal. Nov. 25, 2025) (order certifying Plaintiffs-Petitioners' proposed nationwide Bond Eligible Class, incorporating and extending declaratory judgment from Order Granting Petitioners' Motion for Partial Summary Judgment). On February 18, 2026, the court issued another order explicitly vacating *Yajure Hurtado* and admonishing the respondents, stating that the government had

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continued to "engage in unlawful practices under the guise of 'immigration enforcement' and fidelity to agency regulations" in spite of the fact that "[t]hose practices were found unlawful by way of statutory interpretation by this Court." *Maldonado Bautista v.* Santacruz, Case No. 5:25-cv-01873-SSS-BFM, Dkt. 116 at 14 (C.D. Cal. Feb. 18, 2026). The December 18, 2025 and February 18, 2026 orders in *Maldonado Bautista* have since been temporarily stayed pending the Ninth Circuit's consideration of an emergency motion for a stay pending appeal. *Maldonado Bautista v. Department of Homeland Security*, Case. No. 26-1044, Dtk. 5.1 (9th Cir. 2026).

6. Although *Rodriguez Vazquez* is now being considered on appeal, a District Court decision remains in full force and effect until a stay is issued by the Ninth Circuit. *Nat'l Grange of the Order of Patrons and Husbandry v. Cal. State Grange*, 182 F. Supp. 3d 1065, 1074 (E.D. Cal. 2016); *in re Crystal Palace Gambling Hall, Inc.*, 817 F.2d 1361, 1364 (9th Cir. 1987) ("Absent a stay, all orders and judgments of courts must be complied with promptly").The *Rodriguez Vasquez* order of September 30, 2025 is thus enforceable and should apply to any qualifying Bond Denial Class Member. Nonetheless, the Immigration Courts and DHS have refused to abide by the declaratory relief ordered and have unlawfully held that those in Petitioner's position should be denied the opportunity for a release on bond.

7. Petitioner is a member of the Bond Eligible Cass, as he:

a. Does not currently have lawful immigration status and is detained in executive custody at the Northwest ICE Processing Center;

b. Last entered the United States without inspection about three years ago and was not apprehended by immigration authorities at the border upon arrival, and

c. Is not subject to detention under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

FACTS

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8. After apprehending Petitioner on November 29, 2025, DHS issued a Notice to Appear which it filed with the Tacoma Immigration Court, thereby commencing removal proceedings against Petitioner pursuant to 8 U.S.C. § 1182(a)(6)(A)(i). In the Notice to Appear, DHS charged Petitioner with inadmissibility under 8 U.S.C. § 1182(a)(6)(A)(i) for having entered the United States without inspection.

9. Respondents are bound by the judgment in *Rodriguez Vazquez*, because that judgment has the full "force and effect of a final judgment." 28 U.S.C. § 2201(a). Nonetheless, Respondents continue to defy that judgment and unlawfully purport that Petitioner is subject to mandatory detention under § 1225(b). But this is a clear and flagrant misreading of the law. Petitioner is unambiguously entitled to consideration for release on bond as a Bond Denial Class Member.

10. EOIR leadership has reportedly sent guidance to immigration judges directing them to view district court orders such as that in *Rodriguez Vazquez* as not binding and further indicating that the authority which is controlling for immigration judges is that articulated by the Board of Immigration Appeals in *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025). ICE has issued similar guidance.[1]

11. Given that Respondents are detaining Petitioner in violation of the declaratory judgment in *Rodriguez Vazquez*, the ourt should order that DHS must release Petitioner.

[1] "ICE Memo: Interim Guidance Regarding Detention Authority for Applications for Admission," AILA (July 8, 2025), available at https://www.aila.org/library/ice-memo-interim-guidance-regarding-detention-authority-for-applications-for-admission (last visited Mar. 18, 2026).

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12. In the alternative, the Court should order that Respondents release Petitioner unless EOIR provides Petitioner with a bond hearing under 8 U.S.C, § 1226(a) within fourteen days.

13. The Court should expeditiously grant this petition.

JURISDICTION

14. This action arises under the Constitution of the United States and the INA, 8 U.S.C. § 1101 et seq.

15. This court has subject matter jurisdiction and may grant relief under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), the Declaratory Judgment Act, 28 U.S.C. § 2201 et seq., the All Writs Act, 28 U.S.C. § 1651, and Article I, § 9, cl. 2 of the United States Constitution (Suspension Clause).

16. This Court has jurisdiction to review bond hearings for errors of law, including as to whether the IJ properly concluded someone is a flight risk or danger to the community. *Martinez v. Clark*, 124 F.4th 775, 783 (9th Cir. 2024).

17. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 et. seq., the Declaratory Judgment Act, 28 U.S.C. § 2201 et seq., and the All Writs Act, 28 U.S.C. § 1651.

VENUE

18. Venue is proper because Petitioner is in Respondents' custody at the NWIPC in Tacoma, Washington. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 493–500 (1973), venue lies in the judicial district in which Petitioners are currently in custody.

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19. Venue is also properly in this Court pursuant to 28 U.S.C. § 1391(e) because Respondents are employees, officers, and agencies of the United States, and because a substantial part of the events or omissions giving rise to the claims occurred in the Western District of Washington.

REQUIREMENTS OF 28 U.S.C. § 2241, 2243

20. The Court must grant the petition for writ of habeas corpus or issue an order to show cause ("OSC") to the Respondents "forthwith," unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an OSC is issued, the Court must require Respondents to file a return "within three days unless for good cause additional time, not exceeding twenty days, is allowed." *Id.*

21. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ has been referred to as "perhaps the most important writ known to the constitutional law of England, affording as it does a swift and imperative remedy in all cases of illegal restraint or confinement." *Fay v. Noia*, 372 U.S. 391, 400 (1963).

PARTIES

22. Petitioner **M-A-C-C-** is 42 years old. He is a resident of Beaverton, Oregon. He is currently detained in Respondents' custody at the NWIPC in Tacoma, Washington.

23. Respondent **Kristi Noem** is the Secretary of the Department of Homeland Security. She is responsible for the implementation and enforcement of the Immigration and Nationality Act ("INA") and oversees ICE, the agency responsible for Petitioner's detention. Ms. Noem has ultimate custodial authority over Petitioner and is sued in her official capacity.

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24. Respondent **Julio Hernandez** is the Field Office Director for ICE's Seattle Field Office. The Seattle Field Office is responsible for local custody decisions relating to noncitizens charged with being removable from the United States, including the arrest, detention, and custody status of noncitizens. The Seattle Field Office's area of responsibility includes Alaska, Oregon, and Washington; thus, Hermosillo is a legal custodian of Petitioner.

25. Respondent **Todd Lyons** is the acting director of ICE, and he has authority over the actions of respondent Laura Hermosillo and ICE in general. Respondent Lyons is a legal custodian of Petitioner.

26. Respondent **Pamela Bondi** is the Attorney General of the United States, and as such has authority over the Department of Justice and is charged with faithfully administering the immigration laws of the United States.

27. Respondent **Bruce Scott** is employed by the private corporation The GEO Group, Inc., as Warden of the NWIPC, where Petitioner is detained. He has immediate physical custody of Petitioner.

28. Respondent **EOIR** is the federal agency that has authority over the actions of the immigration court.

29. This action is commenced against all Respondents in their official capacities.

FACTUAL BACKGROUND

Operation Black Rose

30. On January 20, 2025, President Donald Trump issued several executive actions relating to immigration, including "Protecting the American People Against Invasion," an executive order (EO) setting out a series of interior immigration enforcement actions. The

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Trump administration, through this and other actions, has outlined sweeping, executive branch-led changes to immigration enforcement policy, establishing a formal framework for mass deportation. The "Protecting the American People Against Invasion" EO instructs the DHS Secretary "to take all appropriate action to enable" ICE, CBP, and USCIS to prioritize civil immigration enforcement procedures including through the use of mass detention.

31. In late May, Respondent Secretary Noem and White House Deputy Chief of Staff Stephen Miller met with ICE leadership, setting a new arrest quota of 3,000 arrests per day and reportedly threatening job consequences if officials failed to meet arrest quotas.[2]

32. On May 28, Miller confirmed that "[u]nder President Trump's leadership, we are looking to set a goal of a minimum of 3,000 arrests for ICE every day, and President Trump is going to keep pushing to get that number up higher each and every single day."[3]

33. Following the directive from Noem and Miller, ICE agents were instructed in an e-mail to "turn the creativity knob up to 11" and aggressively "push the envelope" in arrests, including by pursuing "collaterals"—individuals who by definition would not have

[2] Elizabeth Findell, et al., *The White House Marching Orders That Sparked the L.A. Migrant Crackdown*, The Wall Street Journal (June 9, 2025), https://www.wsj.com/us-news/protests-los-angeles-immigrants-trump-f5089877; Julia Ainsley, et al., *A sweeping new ICE operation shows how Trump's focus on immigration is reshaping federal law enforcement*, NBC News (June 4, 2025), https://www.nbcnews.com/politics/justicedepartment/ice-operation-trump-focus-immigration-reshape-federal-lawenforcement-rcna193494; Brittany Gibson & Stef W. Kight, Scoop: Stephen Miller, Noem tell ICE to supercharge immigration arrests, Axios (May 28, 2025), available at https://www.axios.com/2025/05/28/immigration-ice-deportations-stephen-miller.

[3] Hannity, *Stephen Miller says the admin wants to create the strongest immigration system in US History*, FOX NEWS (May 28, 2025), available at https://www.foxnews.com/video/6373591405112 (last visited Aug. 24, 2025).

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warrants.[4] As another e-mail put it: "If it involves handcuffs on wrists, it's probably worth pursuing."[5]

34. The overriding message, communicated by and to Respondents, is that agents and officers carrying out immigration operations on the ground must prioritize arrest numbers, regardless of the law. As one ICE official put it earlier this year, all that matters is "numbers, pure numbers, [q]uantity over quality."[6]

35. The District Court for the District of Oregon recently found that DHS implemented these practices in Oregon. *M-J-M-A- v. Hermosillo*, 6:25-cv-02011-MTK, Dkt. 88 at 2 (D.Or. Feb. 27, 2026). The Court found that "[t]o serve the President's demands for 3,000 immigration arrests each day nationally" ICE officers deployed to Oregon communities and arrested an "extraordinary" number of Oregonians beginning in October 2025. *Id.* at 5.

36. The District Court for the District of Oregon found that "ICE officers traveled to Portland, Oregon from their usual duty stations in Arizona, California, Colorado, Minnesota, and Nebraska…to come to Oregon to assist with street arrests and conduct at-large enforcement—finding, locating, and targeting people that are undocumented here in the

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[4] José Olivares, *US immigration officers ordered to arrest more people even without warrants*, The Guardian (June 4, 2025), https://www.theguardian.com/us-news/2025/jun/04/immigration-officials-increased-detentions-collateral-arrests.

[5] José Olivares, *US immigration officers ordered to arrest more people even without warrants*, The Guardian (June 4, 2025), https://www.theguardian.com/us-news/2025/jun/04/immigration-officials-increased-detentions-collateral-arrests.

[6] Jennie Taer, *Trump admin's 3,000 ICE arrests per day quota is taking focus off criminals and 'killing morale': insiders warn*, NY Post, June 17, 2025, https://nypost.com/2025/06/17/us-news/trump-admins-3000-ice-arrests-per-day-quota-is-taking-focus-off-criminals-and-killing-morale-insiders/, https://perma.cc/DB9R-MJUC (last visited Oct. 15, 2025) ("The Trump administration's mandate to arrest 3,000 illegal migrants per day is forcing ICE agents to deprioritize going after dangerous criminals and targets with deportation orders, insiders warn. Instead, federal immigration officers are spending more time rounding up people off the streets, sources said. 'All that matters is numbers, pure numbers. Quantity over quality,' one Immigrations and Customs Enforcement insider told The Post.").

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Portland, Oregon, or Washington area. *Id.* at 6. Enforcement operations in Oregon during this time were variously called "Operation Fortifying the Border," "Operation Black Rose," "Operation Portland Safe," and "Operation Portland Sweep." *Id.*

37. In Operation Black Rose, DHS agents "[l]and[] in [Oregon] communities, officers surveil apartment complexes in the early morning hours, scan license plates for details about the vehicles' owners, and wait for them to get into their vehicles. Officers then stop, arrest, detain and transport people out of the District of Oregon to" Tacoma. *Id*. at 2.

38. According to "[s]worn testimony and substantial evidence before [the MJMA court] show that ICE officers ask few questions and allow little time before shattering windows, handcuffing people, and detaining them at an ICE facility in another state." *Id.* Petitioner's Arrest & Detention.

Petitioner's History, Arrest & Detention

39. Petitioner came to the United States in March 2022 to seek asylum.

40. Before he was detained, he lived with his partner and two of his children in an apartment in Beaverton, Oregon. He had lived in that apartment with his family for about a year and a half. He supported his family by working in a restaurant.

41. He has no criminal record.

42. Petitioner is seeking asylum from Mexico because his partner's family has been targeted by a dangerous cartel. His application for asylum is pending before the Tacoma Immigration Court.

43. On or about November 29, 2025 in the morning, two ICE agents stopped him while he was on his way to work. He was lawfully obeying all the traffic laws.

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44. The ICE agents did not present a warrant and did not explain the reason for the stop.

45. Within minutes, Petitioner was ordered out of his car and placed in handcuffs. Petitioner complied with all the agents instructions and commands.

46. After he was processed at the Portland ICE office, Petitioner was taken to the detention center in Tacoma, where he has been detained ever since

47. Petitioner's detention has been very difficult for him and his family. His family has been forced out of their apartment. The youngest of my children, who is nine years old, has taken my detention particularly hard. He used to be a very happy child, and my partner tells me that he is very depressed now.

CLAIMS FOR RELIEF

CLAIM ONE
Violation of 8 U.S.C. § 1226(a)

48. Petitioner repeats, re-alleges, and incorporates by reference each allegation in the preceding paragraphs as if fully set forth herein.

49. Because he is a member of the Bond Eligible Class in *Maldonado Bautista* and the Bond Denial Class in *Rodriguez Vazquez,* Petitioner is unequivocally entitled to consideration for release on bond pursuant to 8 U.S.C. § 1226(a). The Court in *Maldonado Bautista,* explicitly condemned the government for continuing to rely upon *Yajure Hurtado* to justify unlawfully applying mandatory detention under § 1225(b) to class members. *Maldonado Bautista v.* Santacruz, Case No. 5:25-cv-01873-SSS-BFM, Dkt. 116 at 14 (C.D. Cal. Feb. 18, 2026).

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50. Respondents are parties to *Rodriguez Vazquez,* and are thus bound by the Court's declaratory judgement in that case, which holds the "force and effect of a final judgement." 28 U.S.C. § 2201(a).

51. By finding no jurisdiction to consider Petitioner for release on bond under 8 U.S.C. § 1226(a), Respondents will violate Petitioner's statutory rights under the INA as well as this Court's judgment in *Rodrigue Vazquez*.

COUNT TWO

Violation of the Fifth Amendment to the U.S. Constitution

(Right to Procedural Due Process)

52. Petitioner repeats, re-alleges, and incorporates by reference each allegation in the preceding paragraphs as if fully set forth herein.

53. The Due Process Clause of the Fifth Amendment to the U.S. Constitution prohibits the federal government from depriving any person of "life, liberty, or property, without due process of law." U.S. Const. Amend. V. Due process protects "all 'persons' within the United States, including [non-citizens], whether their presence here is lawful, unlawful, temporary, or permanent." *Zadvydas*, 533 U.S. at 693.

54. Due process requires that government action be rational and non-arbitrary. *See U.S. v. Trimble*, 487 F.3d 752, 757 (9th Cir. 2007).

55. By flagrantly defying the U.S. District Court's orders – as it has been directed to, pursuant to a DHS memorandum dated July 8, 2025[1] – Respondents will deny Petitioner his right to a proceeding in which he has a meaningful opportunity to be heard as to his eligibility for bond and will further deprive Petitioner of a reasoned, non-arbitrary

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decision from the immigration judge as to his custody. In doing so, Respondents will violate Petitioner's right to procedural due process.

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests this Court grant the following:

1. Assume jurisdiction over this matter;
2. Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days;
3. Declare that Petitioner's detention violates the Due Process Clause of the Fifth Amendment, the INA, and the implementing regulations;
4. Issue a Writ of Habeas Corpus ordering Respondents to immediately release Petitioner from custody;
5. In the alternative, issue a writ of habeas corpus requiring Respondents to release Petitioner unless they provide a bond hearing under 8 U.S.C. § 1226(a) within seven days;
6. Issue an Order prohibiting Respondents from transferring Petitioner outside the Northwest ICE Processing Center, without first providing the Court, Petitioner,
7. Award Petitioner attorney's fees and costs under the Equal Access to Justice Act, and on any other basis justified under law; and
8. Grant any further relief this Court deems just and proper.

Dated: March 19, 2026,

s/Miguel Cardenas de Avila

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s/Stephen W. Manning

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JS 44 (Rev. 03/24)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. *(SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)*

I. (a) PLAINTIFFS

M-A-C-C-

(b) County of Residence of First Listed Plaintiff Pierce
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys *(Firm Name, Address, and Telephone Number)*
Stephen W Manning, Kathleen Pritchard, Miguel Cardenas, Innovation Law Lab, 915 Broadway Street, Suite 100 Vancouver, WA 98660 (503) 922-3042

DEFENDANTS

Julio HERNANDEZ; Todd LYONS; Pamela BONDI; Bruce SCOTT; KRISTI NOEM; EOIR

County of Residence of First Listed Defendant
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys *(If Known)*

II. BASIS OF JURISDICTION *(Place an "X" in One Box Only)*

- ☐ 1 U.S. Government Plaintiff
- ☐ 3 Federal Question *(U.S. Government Not a Party)*
- ☒ 2 U.S. Government Defendant
- ☐ 4 Diversity *(Indicate Citizenship of Parties in Item III)*

III. CITIZENSHIP OF PRINCIPAL PARTIES *(Place an "X" in One Box for Plaintiff and One Box for Defendant)*

(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	☐ 1	☐ 1	Incorporated *or* Principal Place of Business In This State	☐ 4	☐ 4
Citizen of Another State	☐ 2	☐ 2	Incorporated *and* Principal Place of Business In Another State	☐ 5	☐ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6

IV. NATURE OF SUIT *(Place an "X" in One Box Only)*

Click here for: Nature of Suit Code Descriptions.

CONTRACT
- ☐ 110 Insurance
- ☐ 120 Marine
- ☐ 130 Miller Act
- ☐ 140 Negotiable Instrument
- ☐ 150 Recovery of Overpayment & Enforcement of Judgment
- ☐ 151 Medicare Act
- ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans)
- ☐ 153 Recovery of Overpayment of Veteran's Benefits
- ☐ 160 Stockholders' Suits
- ☐ 190 Other Contract
- ☐ 195 Contract Product Liability
- ☐ 196 Franchise

REAL PROPERTY
- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent Lease & Ejectment
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 All Other Real Property

TORTS

PERSONAL INJURY
- ☐ 310 Airplane
- ☐ 315 Airplane Product Liability
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Federal Employers' Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☐ 360 Other Personal Injury
- ☐ 362 Personal Injury - Medical Malpractice

PERSONAL INJURY
- ☐ 365 Personal Injury - Product Liability
- ☐ 367 Health Care/ Pharmaceutical Personal Injury Product Liability
- ☐ 368 Asbestos Personal Injury Product Liability

PERSONAL PROPERTY
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- ☐ 371 Truth in Lending
- ☐ 380 Other Personal Property Damage
- ☐ 385 Property Damage Product Liability

CIVIL RIGHTS
- ☐ 440 Other Civil Rights
- ☐ 441 Voting
- ☐ 442 Employment
- ☐ 443 Housing/ Accommodations
- ☐ 445 Amer. w/Disabilities - Employment
- ☐ 446 Amer. w/Disabilities - Other
- ☐ 448 Education

PRISONER PETITIONS

Habeas Corpus:
- ☒ 463 Alien Detainee
- ☐ 510 Motions to Vacate Sentence
- ☐ 530 General
- ☐ 535 Death Penalty

Other:
- ☐ 540 Mandamus & Other
- ☐ 550 Civil Rights
- ☐ 555 Prison Condition
- ☐ 560 Civil Detainee - Conditions of Confinement

FORFEITURE/PENALTY
- ☐ 625 Drug Related Seizure of Property 21 USC 881
- ☐ 690 Other

LABOR
- ☐ 710 Fair Labor Standards Act
- ☐ 720 Labor/Management Relations
- ☐ 740 Railway Labor Act
- ☐ 751 Family and Medical Leave Act
- ☐ 790 Other Labor Litigation
- ☐ 791 Employee Retirement Income Security Act

IMMIGRATION
- ☐ 462 Naturalization Application
- ☐ 465 Other Immigration Actions

BANKRUPTCY
- ☐ 422 Appeal 28 USC 158
- ☐ 423 Withdrawal 28 USC 157

INTELLECTUAL PROPERTY RIGHTS
- ☐ 820 Copyrights
- ☐ 830 Patent
- ☐ 835 Patent - Abbreviated New Drug Application
- ☐ 840 Trademark
- ☐ 880 Defend Trade Secrets Act of 2016

SOCIAL SECURITY
- ☐ 861 HIA (1395ff)
- ☐ 862 Black Lung (923)
- ☐ 863 DIWC/DIWW (405(g))
- ☐ 864 SSID Title XVI
- ☐ 865 RSI (405(g))

FEDERAL TAX SUITS
- ☐ 870 Taxes (U.S. Plaintiff or Defendant)
- ☐ 871 IRS—Third Party 26 USC 7609

OTHER STATUTES
- ☐ 375 False Claims Act
- ☐ 376 Qui Tam (31 USC 3729(a))
- ☐ 400 State Reapportionment
- ☐ 410 Antitrust
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- ☐ 450 Commerce
- ☐ 460 Deportation
- ☐ 470 Racketeer Influenced and Corrupt Organizations
- ☐ 480 Consumer Credit (15 USC 1681 or 1692)
- ☐ 485 Telephone Consumer Protection Act
- ☐ 490 Cable/Sat TV
- ☐ 850 Securities/Commodities/ Exchange
- ☐ 890 Other Statutory Actions
- ☐ 891 Agricultural Acts
- ☐ 893 Environmental Matters
- ☐ 895 Freedom of Information Act
- ☐ 896 Arbitration
- ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
- ☐ 950 Constitutionality of State Statutes

V. ORIGIN *(Place an "X" in One Box Only)*

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District *(specify)*
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing ***(Do not cite jurisdictional statutes unless diversity)***:
28 U.S.C. § 2241

Brief description of cause:
Challenge to unlawful detention

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A **CLASS ACTION** UNDER RULE 23, F.R.Cv.P.

DEMAND $ 0

CHECK YES only if demanded in complaint:
JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE _____ DOCKET NUMBER _____

DATE 03/20/2026

SIGNATURE OF ATTORNEY OF RECORD *s/ Miguel Cardenas*

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____