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**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION**

Lazaro MALDONADO BAUTISTA, et
al., on behalf of themselves and others
similarly situated,

Plaintiffs-Petitioners,

v.

Kristi NOEM, Secretary, Department of
Homeland Security, et al.,

Defendants-Respondents

Case No. 5:25-cv-01873-SSS-BFM

**PLAINTIFFS' STATEMENT OF
UNCONTROVERTED FACTS IN
SUPPORT OF MOTION FOR
PARTIAL SUMMARY
JUDGMENT**

Hearing

Date: October 17, 2025

Time: 2:00 pm

Courtroom: 2

Judge: Sunshine S. Sykes

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STATEMENT OF UNCONTROVERTED FACTS

UNDISPUTED FACT	CITATION
<u>Defendants’ Historical Practice and New Policy</u>	
1. The Immigration and Nationality Act (INA) provides for the detention of certain noncitizens, including—as relevant to this case—under 8 U.S.C. § 1226(a) and § 1225(b)(2)(A).	8 U.S.C. § 1226(a); <i>id.</i> § 1225(b)(2)(A).
2. Detention under 8 U.S.C. § 1226(a) allows for release on bond by immigration authorities, <i>see</i> 8 C.F.R. 236.1(c)(8), and a “custody redetermination”—also known as a bond hearing—before an immigration judge (IJ) in the event the immigration authorities deny bond, <i>see</i> 8 C.F.R. § 1236.1(d).	8 U.S.C. § 1226(a); 8 C.F.R. §§ 236.1(c)(8), 1236.1(d).
3. By contrast, detention under 8 U.S.C. § 1225(b)(2)(A) is mandatory and provides no right to a bond hearing. A person detained pursuant to this subparagraph may only be released if an immigration officer grants humanitarian parole under 8 U.S.C. § 1182(d)(5).	8 U.S.C. § 1225(b)(2)(A); <i>id.</i> § 1182(d)(5).
4. Prior to a May 22, 2025, unpublished Board of Immigration Appeals (BIA or Board) decision and Immigration and Customs Enforcement’s (ICE) July 8, 2025, detention directive, Defendants Department of Homeland Security (DHS), ICE, and the Adelanto Immigration Court considered anyone who entered the United States without	Inspection and Expedited Removal of Aliens, 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997); 8 C.F.R. § 1003.19(h)(2); <i>Matter of R-A-V-P-</i> , 27 I. & N. Dec. 803–04 (BIA 2020); Decl. of Sydney Maltese Ex. A (unpublished BIA decisions applying

PLS.’ STATEMENT OF
UNCONTROVERTED FACTS - 1

<p>inspection to be detained under 8 U.S.C. § 1226(a), unless that person was subject to the expedited removal provisions of 8 U.S.C. § 1225(b)(1) or the detention provisions of § 1226(c) or § 1231.</p>	<p>§ 1226(a) to persons who entered without inspection); Decl. of Lisa Knox ¶¶ 6–7; Decl. of Karla Navarrete ¶ 5; Decl. of Guadalupe Garcia ¶ 5; Decl. of Keli Reynolds ¶ 7; Decl. of Veronica Barba ¶ 6; Decl. of Emily Robinson ¶ 10; Decl. of Doug Jalaie ¶ 8.¹</p>
<p>5. This interpretation has been consistent during the nearly thirty years that the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA) has been in effect.</p>	<p>Inspection and Expedited Removal of Aliens, 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997); 8 C.F.R. § 1003.19(h)(2); <i>Matter of R-A-V-P-</i>, 27 I. & N. Dec. 803–04 (BIA 2020); Maltese Decl. Ex. A (unpublished BIA decisions applying § 1226(a) to persons who entered without inspection); Knox Decl. ¶¶ 6–7; Navarrete Decl. ¶ 5; Garcia Decl. ¶ 5; Reynolds Decl. ¶ 7; Barba Decl. ¶ 6; Robinson Decl. ¶ 10; Jalaie Decl. ¶ 8.</p>
<p>6. It was also true for the law in effect prior to IIRIRA. Under that removal and detention scheme, any person physically inside the United States (unless the person had been paroled) who faced removal was placed in “deportation” proceedings and was considered detained under 8 U.S.C. § 1252(a) (1994), which provided</p>	<p>8 U.S.C. § 1225 (1994); <i>id.</i> § 1226 (1994).</p>

¹ Concurrent with their motion for partial summary judgment, Plaintiffs are also filing a motion for class certification. The declarations and exhibits cited herein have been filed with the motion for class certification, but are submitted in support of both motions.

1	authority to release on bond. Separately, “exclusion” proceedings	
2	covered those who arrived at U.S. ports	
3	of entry and had never entered the	
4	United States. These proceedings had	
5	their own detention scheme. <i>See</i> 8	
	U.S.C. § 1225 (1994); <i>id.</i> § 1226	
	(1994).	
6	7. On July 8, 2025, the Acting Director of	Maltese Decl. Ex. B (ICE
7	ICE, Todd Lyons, issued a new policy	memo).
8	entitled “Interim Guidance Regarding	
	Detention Authority for Applicants for	
	Admission.”	
9	8. Pursuant to the new policy, it is the	Maltese Decl. Ex. B (ICE
10	“position of DHS” that anyone “who	memo).
11	has not been admitted” is “subject to	
12	detention under [8 U.S.C. § 1225(b)]	
	and may not be released from ICE	
	custody except by [8 U.S.C. §	
	1182(d)(5)] parole.”	
13	9. According to Defendants, the result of	Maltese Decl. Ex. B (ICE
14	this new position is that only	memo).
15	noncitizens “admitted to the United	
16	States and chargeable with	
17	deportability under [8 U.S.C. § 1227]”	
18	are entitled to bond hearings, and that	
19	anyone who has not been admitted is	
20	“ineligible for a custody	
	redetermination hearing (‘bond	
	hearing’) before an [IJ] and may not be	
	released for the duration of their	
	removal proceedings absent a parole by	
	DHS.” This means that any person who	
	entered the United States without	
	inspection and who has not since been	
	admitted is considered subject to 8	
	U.S.C. § 1225(b)(2)(A), regardless of	

1	how long the person has lived in the	
2	United States. Such persons will not be	
3	considered for release on bond.	
4	10.ICE’s new policy was issued in “in	Maltese Decl. Ex. B (ICE
5	coordination with the Department of	memo).
6	Justice (DOJ).”	
7	11.Doj includes the Executive Office for	8 C.F.R. § 1003.0(a).
8	Immigration Review (EOIR), which	
9	administers the immigration court	
10	system.	
11	12.The BIA has recently taken the same	Maltese Decl. Ex. C
12	position as ICE’s new directive. On	(unpublished BIA decision).
13	May 22, 2025, the BIA issued an	
14	unpublished decision holding that all	
15	noncitizens who entered the United	
16	States without admission or parole are	
17	considered “applicants for admission”	
18	who are “seeking admission” under 8	
19	U.S.C. § 1225(b)(2)(A) and are	
20	therefore ineligible for IJ bond	
	hearings.	
	13.Since the BIA’s unpublished decision	Maltese Decl. Exs. D–G
	and the shift in DHS’s position, the IJs	(Named Plaintiffs’ IJ bond
	of the Adelanto Immigration Court	decisions); Knox Decl. ¶¶ 3–5,
	have adopted DHS’s policy and legal	7; Navarrete Decl. ¶¶ 3–4;
	interpretation. The Adelanto IJs now	Garcia Decl. ¶ 3–4; Reynolds
	hold that any person who entered the	Decl. ¶ 3–6; Barba Decl. ¶ 3–5;
	United States without inspection is	Robinson Decl. ¶ 6–9; Jalaie
	subject to mandatory detention under 8	Decl. ¶¶ 3–6; <i>supra</i> , Statement
	U.S.C. § 1225(b)(2)(A). Such persons	of Uncontroverted Facts ¶¶ 3,
	will not be considered for release on	8–9.
	bond.	
	14.A visiting IJ who is not a member of	Jalaie Decl. ¶ 7.
	the Adelanto Immigration Court, but	
	who hears some cases there through	

1	video conference, has not adopted	
2	DHS's interpretation and has continued	
3	to provide bonds for detained	
4	noncitizens who entered without	
	inspection. However, ICE has refused	
	to release persons who are granted and	
	post such bonds.	
5	15. In other immigration courts throughout	Decl. of Juan Gonzalez
6	the United States, some IJs have	Martinez ¶¶ 9, 11–12; Decl. of
7	continued to grant bond for persons	Roxana Cortes Mills ¶¶ 6–7;
8	who entered without inspection and	Pet. for Writ of Habeas Corpus,
9	who have since resided in the United	<i>Herrera Torralba v. Knight</i> , No.
10	States. However, in these cases, DHS	2:25-cv-01366 (D. Nev. July 28,
11	has filed a Form EOIR-43, Notice of	2025), Dkt. 5 ¶¶ 57, 64, 65;
	Service Intent to Appeal Custody	Resp. to Pet. for Writ of Habeas
	Redetermination, and invoked the	Corpus, <i>Mayo Anicasio v.</i>
	automatic stay provision of 8 C.F.R. §	<i>Kramer</i> , No. 4:25-cv-03158-
	1003.19(i)(2). As a result, these	JFB-RCC (D. Neb. Aug. 7,
	persons have not been able to post	2025), Dkt. 19 at 2–4.
	bond and have remain detained.	
12	16. DOJ and EOIR—which oversee the	Dkt. 8 at 11–15; Mot. to
13	immigration courts—have taken the	Dismiss, <i>Rodriguez Vazquez v.</i>
14	position in litigation parallel to this	<i>Bostock</i> , No. 3:25-CV-05240-
15	case that individuals like Plaintiffs are	TMC (W.D. Wash. June 6,
	subject to detention under §	2025), Dkt. 49 at 27–30.
	1225(b)(2)(A). They have also since	
	taken that position in this litigation.	
16	17. The result of Defendants' new policies	Knox Decl. ¶¶ 8–10; Garcia
17	is months of detention for those who	Decl. ¶¶ 6–7; Reynolds Decl.
18	file an application for relief and	¶¶ 8–9; Barba Decl. ¶¶ 7–8;
19	proceed to a merits hearing before an	Robinson Decl. ¶¶ 12–14;
20	IJ. For those who subsequently appeal	Maltese Decl. Ex. H (EOIR
	their decision to the BIA, recent data	FOIA data); <i>id.</i> Ex. B (ICE
	from EOIR produced pursuant to a	memo).
	Freedom of Information Act (FOIA)	
	request reflects that the BIA, on	
	average, takes over six additional	

1	months to adjudicate an appeal. During	
2	this entire time, a noncitizen subject to	
3	Defendants' new policies will remain	
4	detained unless ICE releases the person	
5	on humanitarian parole.	
6	<u>Plaintiff Lazaro Maldonado Bautista</u>	
7	18.On June 6, 2025, Plaintiff Lazaro	Maltese Decl. Ex. I (Maldonado
8	Maldonado Bautista was arrested by	I-213); Decl. of Lazaro
9	immigration authorities as part of a	Maldonado Bautista ¶ 7.
10	large-scale immigration enforcement	
11	action in Los Angeles.	
12	19.Mr. Maldonado's arrest records reflect	Maltese Decl. Ex. I (Maldonado
13	that DHS issued him a "Warrant of	I-213).
14	Arrest."	
15	20.Mr. Maldonado was subsequently	Maltese Decl. Ex. I (Maldonado
16	detained at the Adelanto ICE	I-213); Maldonado Decl. ¶ 7.
17	Processing Center.	
18	21.Following his arrest, DHS placed Mr.	Maltese Decl. Ex. J (Maldonado
19	Maldonado in removal proceedings	Notice to Appear (NTA));
20	before the Adelanto Immigration Court	Maldonado Decl. ¶ 8.
	pursuant to 8 U.S.C. § 1229a. ICE has	
	charged him with, inter alia, being	
	inadmissible under 8 U.S.C. §	
	1182(a)(6)(A)(i) as someone who	
	allegedly entered the United States	
	without inspection.	
	22.ICE denied Mr. Maldonado release on	Maltese Decl. Ex. K
	bond, and he requested a bond	(Maldonado Bond Record);
	redetermination hearing before an IJ.	Maldonado Decl. ¶ 9.
	23.Before the IJ, ICE argued that the IJ	Maltese Decl. Ex. L (DHS
	lacked jurisdiction to set bond for Mr.	Maldonado Bond Submission);
		Maldonado Decl. ¶ 9.

1	Maldonado and that he is detained under 8 U.S.C. § 1225(b)(2)(A).	
2		
3	24. On July 17, 2025, an Adelanto IJ issued a decision that the immigration court lacked jurisdiction to conduct a bond redetermination hearing because Mr. Maldonado is subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A). Accordingly, Mr. Maldonado was denied release on bond.	Maltese Decl. Ex. D (Maldonado IJ Bond decision); Maldonado Decl. ¶ 9.
4		
5		
6		
7		
8	25. The bond record in Mr. Maldonado's bond proceedings and other documents reflect that:	
9		
10	a. Mr. Maldonado has lived in Los Angeles, California for approximately four years.	a. Maltese Decl. Ex. K at 82, 94–95, 97, 102, 105, 109 (Maldonado Bond Record); Maldonado Decl. ¶ 3.
11		
12	b. Mr. Lazaro has no criminal record.	b. Maltese Decl. Ex. I (Maldonado I-213); Maldonado Decl. ¶ 6.
13		
14	c. Prior to his arrest, Mr. Maldonado had no previous contact with immigration authorities.	c. Maltese Decl. Ex. I (Maldonado I-213).
15		
16		
17	d. Mr. Maldonado has deep ties to the Los Angeles area, as he has several U.S. citizen family members who live in the area.	d. Maltese Decl. Ex. K at 82, 99, 107 (Maldonado Bond Record); Maldonado Decl. ¶ 4.
18		
19	e. Mr. Maldonado has worked at the same company, Blue Dot USA, Inc., as a warehouse packer since 2021.	e. Maltese Decl. Ex. K at 78, 94–95, 97 (Maldonado Bond Record); Maldonado Decl. ¶ 5.
20		

f. Mr. Maldonado's friends and family consider him a hard worker who is loving and respectful. Letters of support from his bond case indicate that his family and friends miss him dearly and that Mr. Maldonado will return to a supportive community if released.

f. Maltese Decl. Ex. K at 97, 99, 102, 105, 107, 109, 112 (Maldonado Bond Record).

Plaintiff Ana Franco Galdamez

26. On June 19, 2025, Plaintiff Ana Franco Galdamez was arrested by immigration authorities as part of large-scale immigration enforcement actions in Los Angeles.

Maltese Decl. Ex. M (Franco I-213); Decl. of Ana Franco Galdamez ¶ 7.

27. Ms. Franco's arrest records reflect that DHS issued her a "Warrant of Arrest."

Maltese Decl. Ex. M (Franco I-213).

28. Ms. Franco was subsequently detained at the Adelanto ICE Processing Center.

Maltese Decl. (Franco I-213); Franco Decl. ¶ 7.

29. Following her arrest, DHS placed Ms. Franco in removal proceedings before the Adelanto Immigration Court pursuant to 8 U.S.C. § 1229a. ICE has charged her with, inter alia, being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i) as someone who allegedly entered the United States without inspection.

Maltese Decl. Ex. N (Franco NTA).

30. ICE denied Ms. Franco release on bond, and she requested a bond redetermination hearing before an IJ.

Maltese Decl. Ex. O (Franco Bond Record); Franco Decl. ¶ 9.

1	31. Before the IJ, ICE argued that the IJ lacked jurisdiction to set bond for Ms. 2 Franco and that she is detained under 8 U.S.C. § 1225(b)(2)(A).	Maltese Decl. Ex. P (DHS Franco Bond Submission).
3		
4	32. On July 22, 2025, an Adelanto IJ issued a decision that the immigration court lacked jurisdiction to conduct a 5 bond redetermination hearing because Ms. Franco is subject to mandatory 6 detention under 8 U.S.C. § 1225(b)(2)(A). Accordingly, Ms. 7 Franco was denied release on bond.	Maltese Decl. Ex. E (Franco IJ Bond decision); Franco Decl. ¶ 9.
8	33. The bond record in Ms. Franco's bond proceedings and other documents 9 reflect that:	
10	a. Ms. Franco has resided in the United States for over twenty 11 years.	a. Maltese Decl. Ex. O at 141 (Franco IJ Bond Record); Franco Decl. ¶ 3.
12	b. Ms. Franco has no criminal 13 record.	b. Maltese Decl. Ex. M (Franco I-213); Franco Decl. ¶ 6.
14	c. Prior to her arrest, Ms. Franco had no previous contact with 15 immigration authorities.	c. Maltese Decl. Ex. M (Franco I-213).
16	d. Ms. Franco is the single mother of two U.S. citizen children who 17 rely on her for financial support and who are about to begin 18 college.	d. Maltese Decl. Ex. O at 141– 54, 162–64, 167, 169–73 (Franco IJ Bond Record); Franco Decl. ¶¶ 4–5, 10–11.
19	e. Prior to her arrest, Ms. Franco worked as a street vendor to 20 provide for her family.	e. Franco Decl. ¶ 5.

1	f. Ms. Franco recently completed treatment for breast cancer.	f. Maltese Decl. Ex. O at 141,
2	Because of her detention, she	175 (Franco IJ Bond
3	missed an important follow up	Record); Franco Decl. ¶ 14.
4	mammogram.	
5	g. Ms. Franco also has not received	g. Franco Decl. ¶ 12.
6	her regular psychiatric care	
7	while in detention.	
8	h. Ms. Franco has diabetes, and the	h. Maltese Decl. Ex. O at 183;
9	irregular food schedule in the	Franco Decl. ¶ 13.
10	detention center has significantly	
11	affected her sugar levels. On	
12	July 21, 2025, she passed out at	
13	the detention center and was	
14	hospitalized. She has not	
15	received any of the records	
16	related to her medical care and	
17	hospitalization.	
18	i. Ms. Franco's family members	i. Maltese Decl. Ex. O at 154,
19	and friends consider her to be a	162–64, 167, 169–73
20	woman of integrity, who is an	(Franco IJ Bond Record);
	involved and loving mother and	Franco Decl. ¶¶ 5, 10.
	works hard to provide for her	
	family as a single mother. She	
	has been very involved in the life	
	of her daughters, receiving	
	recognition for her volunteer	
	work in their activities.	
<u>Plaintiff Ananias Pascual</u>		
34.	On June 6, 2025, Plaintiff Ananias	Maltese Decl. Ex. Q (Pascual I-
	Pascual was arrested by immigration	213); Decl. of Ananias Pascual
	authorities as part of a large-scale	¶ 7.
	immigration enforcement action in Los	
	Angeles.	

1	35.Mr. Pascual’s arrest records reflect that DHS issued him a “Warrant of Arrest.”	Maltese Decl. Ex. Q (Pascual I-213).
2		
3	36.Mr. Pascual was subsequently detained at the Adelanto ICE Processing Center.	Pascual Decl. ¶ 7.
4		
5	37.Following his arrest, DHS placed Mr. Pascual in removal proceedings before the Adelanto Immigration Court pursuant to 8 U.S.C. § 1229a. ICE has charged him with, inter alia, being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i) as someone who allegedly entered the United States without inspection.	Maltese Decl. Ex. R (Pascual NTA).
6		
7		
8		
9	38.ICE denied Mr. Pascual release on bond, and he requested a bond redetermination hearing before an IJ.	Maltese Decl. Ex. S (Pascual Bond Record); Pascual Decl. ¶ 9.
10		
11	39.Before the IJ, ICE argued that the IJ lacked jurisdiction to set bond for Mr. Pascual and that he is detained under 8 U.S.C. § 1225(b)(2)(A).	Pascual Decl. ¶ 9.
12		
13		
14	40.On July 15, 2025, an Adelanto IJ issued a decision that the immigration court lacked jurisdiction to conduct a bond redetermination hearing because Mr. Pascual is subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A). Accordingly, Mr. Pascual was denied release on bond.	Maltese Decl. Ex. F (Pascual IJ Bond decision); Pascual Decl. ¶ 9.
15		
16		
17		
18	41.The bond record in Mr. Pascual’s bond proceedings and other documents reflect that:	
19		
20		

- | | | |
|----|-------------------------------------|------------------------------------|
| 1 | a. Mr. Pascual has resided in the | a. Maltese Decl. Ex. Q (Pascual |
| 2 | United States for over twenty | I-213); <i>id.</i> Ex. S at 231–72 |
| 3 | years. | (Pascual Bond Record); |
| 4 | | Pascual Decl. ¶ 3. |
| 5 | b. Mr. Pascual has no criminal | b. Maltese Decl. Ex. Q (Pascual |
| 6 | record. | I-213); Pascual Decl. ¶ 6. |
| 7 | c. Prior to his arrest, Mr. Pascual | c. Maltese Decl. Ex. Q (Pascual |
| 8 | had no previous contact with | I-213). |
| 9 | immigration authorities. | |
| 10 | d. Mr. Pascual and his wife have | d. Maltese Decl. Ex. S at 274– |
| 11 | four U.S. citizen children, who | 79, 281–96, 308 (Pascual |
| 12 | range in age from 10 months to | Bond Record); Pascual Decl. |
| 13 | ten years old. | ¶ 4. |
| 14 | e. Mr. Pascual’s youngest child | e. Maltese Decl. Ex. S at 280 |
| 15 | was recently admitted to the | (Pascual Bond Record); |
| 16 | Children’s Hospital of Los | Pascual Decl. ¶ 11. |
| 17 | Angeles. | |
| 18 | f. In addition to his immediate | f. Maltese Decl. Ex. S at 302, |
| 19 | family, Mr. Pascual has six | 304, 308 (Pascual Bond |
| 20 | siblings who live in the United | Record); Pascual Decl. ¶ 4. |
| | States. | |
| | g. Mr. Pascual has been employed | g. Maltese Decl. Ex. S at 250, |
| | by the same apparel company | 253, 257, 260, 263, 266, 269, |
| | since 2016. | 272 (Pascual Bond Record); |
| | | Pascual Decl. ¶ 5. |
| | h. Mr. Pascual’s family and friends | h. Maltese Decl. Ex. S at 302, |
| | attest that Mr. Pascual is a kind, | 304, 306, 308, 310 (Pascual |
| | hardworking, and dedicated man | Bond Record). |
| | and father whose separation | |
| | from his family has been | |
| | devastating. | |

Plaintiff Luiz Alberto De Aquino De Aquino

42. On June 6, 2025, Plaintiff Luiz Alberto De Aquino De Aquino was arrested by immigration authorities as part of a large-scale immigration enforcement action in Los Angeles.	Maltese Decl. Ex. T (De Aquino I-213); Decl. of Luiz De Aquino De Aquino ¶ 5.
43. Mr. De Aquino was subsequently detained at the Adelanto ICE Processing Center.	De Aquino Decl. ¶ 6.
44. Following his arrest, DHS placed Mr. De Aquino in removal proceedings before the Adelanto Immigration Court pursuant to 8 U.S.C. § 1229a. ICE has charged him with, inter alia, being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i) as someone who allegedly entered the United States without inspection.	Maltese Decl. Ex. U (De Aquino NTA); De Aquino Decl. ¶ 6.
45. ICE denied Mr. De Aquino release on bond, and he requested a bond redetermination hearing before an IJ.	De Aquino Decl. ¶ 7.
46. Before the IJ, ICE argued that the IJ lacked jurisdiction to set bond for Mr. De Aquino and that he is detained under 8 U.S.C. § 1225(b)(2)(A).	De Aquino Decl. ¶ 7.
47. On July 21, 2025, an Adelanto IJ issued a decision that the immigration court lacked jurisdiction to conduct a bond redetermination hearing because Mr. De Aquino is subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A). Accordingly, Mr. De Aquino was denied release on bond.	Maltese Decl. Ex. G (De Aquino IJ Bond decision); De Aquino Decl. ¶ 7.

<p>1 48. The bond record in Mr. De Aquino's 2 bond proceedings and other documents reflect that:</p> <p>3 a. Mr. De Aquino has resided in 4 Los Angeles, California since 2022.</p> <p>5 b. Mr. De Aquino has no criminal 6 record.</p> <p>7 c. Prior to his arrest, Mr. De 8 Aquino had no previous contact with immigration authorities.</p> <p>9 d. Mr. De Aquino has worked for 10 the same apparel company since 2022.</p> <p>11 e. He has been together with his 12 spouse for seventeen years and 13 has been separated from her since his arrest.</p> <p>14 f. Mr. De Aquino's friends attest to 15 the fact that he is a hard-working and family-oriented man of 16 character and integrity.</p>	<p>a. Maltese Decl. Ex. V at 347– 69 (De Aquino Bond Record); De Aquino Decl. ¶ 3.</p> <p>b. Maltese Decl. Ex. T (De Aquino I-213); De Aquino Decl. ¶ 4.</p> <p>c. Maltese Decl. Ex. T (De Aquino I-213).</p> <p>d. Maltese Decl. Ex. V at 347– 69 (De Aquino Bond Record); De Aquino Decl. ¶ 3.</p> <p>e. Maltese Decl. Ex. V at 371, 374–76, 378 (De Aquino Bond Record).</p> <p>f. Maltese Decl. Ex. V at 382, 384, 386, 388, 390, 392, 402 (De Aquino Bond Record).</p>
<p>17 Results of Plaintiffs' Bond Hearings</p>	
<p>18 49. After this Court's order granting the 19 Plaintiffs' motion for a temporary restraining order, Dkt. 14, each named 20 Plaintiff received a bond hearing in immigration court at which the IJ found that each Plaintiff did not pose a</p>	<p>Maldonado Decl. ¶ 12; Franco Decl. ¶ 16; Pascual Decl. ¶ 14; De Aquino Decl. ¶ 10.</p>

flight risk or danger, and granted
release on bond.

DATED this 11th of August, 2025.

/s/ Matt Adams

Matt Adams*

/s/ Aaron Korthuis

Aaron Korthuis*

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