

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

ANY LUCIA LOPEZ BELLOZA,

Petitioner,

v.

PATRICIA HYDE, Field Office Director,  
MICHAEL KROL, HSI New England Special  
Agent in Charge, TODD LYONS, Acting  
Director U.S. Immigration and Customs  
Enforcement, KRISTI NOEM, U.S. Secretary  
of Homeland Security, PAMELA BONDI,  
U.S. Attorney General, DONALD J. TRUMP,  
President of the United States,

Respondents.

Case No. 1:25-cv-13499-RGS

**NOTICE OF PETITIONER ANY LUCIA LOPEZ BELLOZA**

Petitioner Any Lucia Lopez Belloza hereby gives notice of the following updates in connection with the Court's Order of February 13, 2026 (Doc. No. 42).

Respondents' February 26, 2026 submission made clear that they intended today to return Any to a location in the Southern District of Texas and then "to effectuate [her] final order of removal after she is returned." Doc. No. 52, at 3 & n.1. Respondents further "provid[ed] advance notice" of that intention, apparently to trigger the 72-hour notice period required by this Court's November 24, 2025 stay order. *Id.*; see Doc. No. 4, at 3. And notably, Respondents made clear their intention to argue that the federal district courts lack jurisdiction to enter a stay of removal once Any is returned to the United States, even if a new habeas petition is filed, and even though Any maintains that this Court has always possessed authority to issue a stay of removal and other relief. Doc. No. 52, at 3–4.

In light of these last-minute assertions, it is clear that Respondents planned to fly Any to the Southern District of Texas, detain her there, and then seek to remove her again—all while arguing that no federal court may stop them. In light of these last-minute assertions, Any declined to participate in Respondents’ ineffectual offer of “relief” and did not board the flight offered to her under these conditions. Instead, as Any will explain in her forthcoming response to the motion to dismiss and, if necessary, on appeal, this Court erred in concluding that it lacked jurisdiction over the instant habeas petition, and should have directed Any’s return to the District of Massachusetts.

Any intends to file a response to Respondents’ motion to dismiss by March 5, 2026.

Respectfully submitted,

February 27, 2026

/s/ Lee S. Wolosky

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**Certificate of Service**

I, Lee S. Wolosky, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the NEF and paper copies will be sent to those indicated as non-registered participants.

February 27, 2026

/s/ Lee S. Wolosky