IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Carlos Rene Morales, Rosa Vargas, Morales, Juan Mijangos Vargas, Juneidy Mijangos Vargas, D.M.V., J.A.M., Salvador Alfaro, Johana Gutierrez, Y.S.G.R., J.I.G.R., Lesly Padilla Padilla, E.D.N.P, and E.I.N.P.,	:	
Plaintiffs,	:	
	:	Civil Action No.
v.	:	
	:	1:17-CV-05052-SCJ
The United States of America,	:	
Defendant.	:	

DEFENDANT'S REPLY IN SUPPORT OF MOTION TO DISMISS

Defendant United States of America ("United States") hereby files its Reply in Support of Motion to Dismiss, showing the Court as follows:

A. The District Court Lacks Subject Matter Jurisdiction Over Plaintiffs' Claims Pursuant to the Immigration and Nationality Act.

1. 8 U.S.C. § 1252(g) Governs This Case and Precludes Jurisdiction.

Plaintiffs misconstrue *Jennings v. Rodriguez*, 138 S.Ct. 830 (2018) for the proposition that 8 U.S.C. § 1252(g) "must be read narrowly" in some new way that alters this case. Opposition at 1. While a majority of the Court held that 8 U.S.C. § 1252(b)(9), a provision not at issue here, did not apply in the context of *Jennings*—aliens detained for more than six months who sought a bond hearing—no opinion

garnered a plurality for the legal standard interpreting the provision.[1] More importantly, the *Jennings* dicta cited by Plaintiffs does nothing to cast doubt on the binding precedent that governs this case. Indeed, the order affirmed by the Eleventh Circuit in *Gupta* noted "the Supreme Court's narrow construction of § 1252(g)," but nevertheless held "all of Gupta's claims are barred by the plain text of that statute." *Gupta v. McGahey*, No. 610CV280ORL22GJK, 2011 WL 13137351, at *1 (M.D. Fla. Sept. 8, 2011), *aff'd*, 709 F.3d 1062 (11th Cir. 2013). The same applies here.

Citing *Alvarez v. U.S. Immigration & Customs Enf't*, Plaintiffs propose a misguided retreat to statutory interpretation principles on grounds that there is a "strong presumption in favor of judicial review of administrative action." 818 F.3d 1194, 1201 (11th Cir. 2016). This argument ignores the channeling function of § 1252(g), designed to prevent "separate rounds of judicial intervention outside the streamlined process that Congress has designed." *Reno v. American-Arab Anti-*

[1] Plaintiffs rely on the portion of Justice Alito's opinion that was not the opinion of the Court, wherein he rejected an "expansive interpretation" that would hold a case "aris[es] from … the actions taken to remove these aliens" solely because "the aliens' injuries would never have occurred if they had not been placed in detention." *Jennings*, 138 S.Ct. at 840 (Alito, J.). Such an interpretation has not been urged by the United States, nor is it found in binding Eleventh Circuit precedent. Justice Alito feared an expansive interpretation would bar claims in extreme situations, none of which are alleged here. Instead, the facts are nearly identical to *Gupta*, where the Eleventh Circuit had no difficulty finding that § 1252(g) precluded jurisdiction.

Discrimination Comm., 525 U.S. 471, 485 (1999). Plaintiffs also ignore the holding in *Alvarez*, which found that "the district court was correct" when it held that "ICE's decision to take him into custody and to detain him during his removal proceedings … were closely connected to the decision to commence proceedings, and thus were immune from our review." *Id.* at 1203. In particular, "[b]ecause Alvarez challenges the methods that ICE used to detain him prior to his removal hearing, these claims are foreclosed by § 1252(g) and our decision in *Gupta*." *Id.* at 1204 (emphasis added).[2] The Eleventh Circuit's clear holding in *Alvarez* is that, notwithstanding the jurisprudential principles relied on by Plaintiffs, § 1252(g) bars Plaintiffs' claims.[3]

2. The Enforcement Actions at Issue Arise From Effort to Commence Proceedings and Execute Removal Orders.

Plaintiffs cite cases from other jurisdictions that involve materially different facts and are not persuasive in the face of the binding precedent in *Gupta* and *Alvarez*. Like Plaintiffs, Gupta challenged his arrest and detention by immigration officials, and argued his claims were not barred by Section 1252(g) because the decision to arrest and detain an alien is distinct from the decision to initiate removal

[2] The court disagreed solely with dismissal of Alvarez's claim that "the agency had no statutory grounds on which to detain him because his removal was not reasonably foreseeable." *Alvarez*, 818 F.3d at 1204. Plaintiffs have no such claims.

[3] The court recognized in *Alvarez* that the Supreme Court "instructs us to narrowly interpret § 1252(g)," but found nothing in this instruction to prevent the court from reaffirming *Gupta* and barring the plaintiff's claims. 818 F.3d at 1202, 1204.

proceedings. *Gupta v. McGahey*, 709 F.3d 1062, 1065 (11th Cir. 2013). The Eleventh Circuit rejected his arguments and this Court must reject them here.

Plaintiffs' efforts to distinguish *Gupta* are ineffective. Plaintiffs argue that *Gupta* did not involve agents "acting outside agency policy." Opposition at 12.[4] But Gupta brought claims for "constitutional violations" alleging ICE agents, amongst other things "unlawfully arrested him, conducted illegal searches of his residence and vehicle at the time of his arrest, improperly seized certain items from him, and wrongfully caused him to be detained without bond for five weeks." *Gupta*, 2011 WL 13137351, at *1. Such allegations self-evidently involve agents "acting outside agency policy." Moreover, this distinction is immaterial. The plain language of § 1252(g) applies to both discretionary and non-discretionary decisions. *See Foster v. Townsley*, 243 F.3d 210, 213–15 (5th Cir. 2001) (holding that § 1252(g) stripped the district court of jurisdiction to hear *Bivens* claims for constitutional deprivations resulting from the plaintiff's removal, even when the actions taken were non-discretionary and violated regulatory requirements); *Tsering v. U.S. Immigration &*

[4] Plaintiffs separately argue that conduct that violated their Fourth Amendment rights does not 'arise from' a discretionary decision or act, and is therefore not precluded by § 1252(g). *See* Opposition at 5-6. The Eleventh Circuit (and dozens of other courts) has repeatedly found that even constitutional violations are barred by § 1252(g). Both *Gupta* and *Alvarez* were *Bivens* actions where the only claims were allegations of constitutional violations like those alleged by Plaintiffs.

Customs Enforcement, 403 F. App'x 339, 342 (10th Cir. 2010) (same); *Silva v. United States*, 866 F.3d 938, 940-41 (8th Cir. 2017) (rejecting plaintiff's effort to "narrow the scope of § 1252(g) to discretionary decisions of the Secretary").[5]

Plaintiffs then argue that *Gupta* is distinct because that case arose based on actions "taken to commence proceedings," whereas the facts of this case involve "continuing a process." Opposition at 13. This is a distinction invented by Plaintiffs and supported only by their citation to "common sense." *Id.* In many cases, the excluded claims arose in the midst of ongoing immigration proceedings, well after Plaintiffs' narrow view of what "commence[s] proceedings." *See, e.g.*, *Cho v. United States*, No. 5:13-CV-153 (MTT), 2016 WL 1611476, at *2 (M.D. Ga. Apr. 21, 2016) (immigration authorities had issued a Notice to Appear at the time of the alleged false arrest); *Foster v. Townsley*, 243 F.3d 210, 211 (5th Cir. 2001) (plaintiff subject to removal order at time of events he claimed showed excessive force).

Moreover, Plaintiffs ignore that § 1252(g) precludes claims based not just on actions "to commence proceedings," but also efforts to "execute removal orders

[5] Plaintiffs also try to distinguish between "decisions and actions taken by ICE agents to violate the Constitution" and "the Attorney General's decision or action regarding removal." Opposition at 12. Again, this is a distinction unsupported by any law and directly contradicted by binding precedent. The plaintiffs in *Gupta* and *Alvarez* also purported to be targeting "decisions and actions taken by ICE agents to violate the Constitution," and § 1252(g) still barred their claims.

against any alien." 8 U.S.C. § 1252(g). All of Plaintiffs' claims arise from the decision to execute removal orders against Ms. Vargas and her children, Ms. Padilla and her children, and Ana Mejia Gutierrez and her son, as acknowledged in Plaintiffs' complaint.[6] Plaintiffs offer no basis for why the reasoning of *Gupta* does not apply equally to efforts to "execute removal orders against any alien." *Id*.

Cases from this district and circuit, which Plaintiffs ignore, amply illustrate the applicability of § 1252(g) and *Gupta* to bar Plaintiffs' claims. In *Cho v. United States*, the plaintiff brought FTCA claims asserting, "she was falsely arrested and falsely imprisoned when she was taken into custody and detained for removal proceedings." *Cho v. United States*, No. 5:13-CV-153 (MTT), 2016 WL 1611476, at *1 (M.D. Ga. Apr. 21, 2016), *aff'd sub nom. Dae Eek Cho v. United States*, 687 F. App'x 833 (11th Cir. 2017). Citing *Gupta*, the district court found that "[p]laintiff's claims that she was falsely arrested when she was transferred into ICE custody and falsely imprisoned until she was released 'challenge[ ] the actions the agents took to commence removal proceedings—exactly the claims that § 1252(g) bars from the subject-matter jurisdiction of federal courts.'" *Id.* at *7.

[6] In their Opposition, Plaintiffs assert that they do not "concede" the validity of these removal orders. Opposition at 6 n.3. However, there are no allegations in their Complaint, let alone specific facts sufficient under *Bell Atl. Corp. v. Twombly*, 550 U.S. 544 (2007), to suggest that the removal orders were invalid in any way.

In *Magallenes v. United States*, the plaintiffs alleged ICE agents obtained entry into their home by use of a ruse when they were "searching for Mr. Sanchez-Castaneda, due to his prior convictions, and his brother, who had a pending deportation order." *Magallanes v. United States*, 184 F. Supp. 3d 1372, 1373-74 (N.D. Ga. 2015) (emphasis added). The court dismissed the claims because they arose "from the decision to commence proceedings and execute a removal order." *Id.* at 1377 (emphasis added). The court found the plaintiffs' "challenge arises directly from the decision to execute a removal order because it challenges the manner in which the removal was performed." *Id.* at 1378 (emphasis added).

Plaintiffs rely on a few cherry-picked cases from other jurisdictions that are not persuasive in the face of *Gupta* and *Alvarez* and arise from easily distinguished facts. Plaintiffs cite repeatedly to *Humphries v. Various Fed. USINS Employees*, 164 F.3d 936 (5th Cir. 1999). *See* Opposition at 9-10. In *Humphries*, the plaintiff alleged "mistreatment while in detention," which the court deemed too far removed from the original efforts to commence proceedings or execute removal orders. 164 F.3d at 944. Plaintiffs bring no such claims. Even the *Humphries* court recognized that § 1252(g) bars claims where the action to commence proceedings or execute removal orders "provide[s] the most direct, immediate, and recognizable cause of [the plaintiff's] injury." *Id.* at 945. Indeed, the Fifth Circuit subsequently held in

Foster v. Townsley, a case closer to Plaintiffs' allegations, that "claims of excessive force, denial of due process, denial of equal protection and retaliation are all directly connected to the execution of the deportation order." 243 F.3d at 214.

Plaintiffs' allegations, like those in *Foster*, *Gupta, Cho*, and *Magallanes*, are intimately connected with the efforts to commence proceedings and execute removal orders and are excluded under § 1252(g). *See Khorrami v. Rolince*, 493 F. Supp. 2d 1061, 1068 (N.D. Ill. 2007) ("[Plaintiff's] Fourth Amendment claim (the portion covering the arrest/detention) is more akin to the *Humphries* plaintiff's retaliatory exclusion claim than to his involuntary servitude or his mistreatment claims… It was a direct outgrowth of the decision to commence proceedings.").

Plaintiffs also rely on a series of district court cases from places such as Connecticut and Virginia, which are of no persuasive effect insofar as they conflict with the Eleventh Circuit decisions in *Gupta* and *Alvarez*.[7] *See* Opposition at 10-11. They are also readily distinguished. In *El Badrawi v. Dep't of Homeland Sec.*, the court emphasized that the "initial arrest and detention" was separate from the subsequent "decision to commence removal proceedings." 579 F. Supp. 2d 249, 266 (D. Conn. 2008). The facts here are rather distinct, as Plaintiffs emphasize elsewhere

[7] Indeed, Gupta himself tried and failed to rely on the same line of cases. *See Gupta v. McGahey*, No. 610CV280ORL22GJK, 2011 WL 13137351, at *1 n.4 (M.D. Fla. Sept. 8, 2011), *aff'd*, 709 F.3d 1062 (11th Cir. 2013)

in their Opposition.[8] The actions challenged here were "to execute final removal orders," which, as discussed above, is a separate basis for excluding jurisdiction under § 1252(g). Similarly inapt is Plaintiffs' reliance on *Medina v. U.S.*, 92 F. Supp. 2d 545 (E.D. Va. 2000), which conflicts with *Gupta*, has not been followed by other courts, was vacated on other grounds, and was explicitly premised on having been brought only after "immigration proceedings have terminated." 92 F. Supp. 2d at 553, *vacated on other grounds*, 259 F.3d 220 (4th Cir. 2001); *see also Pedroza v. Gonzalez*, No. 09-CV-1766-LAB WVG, 2010 WL 6052381, at *6 (S.D. Cal. Dec. 13, 2010) ("[*Medina*] has not been broadly accepted.").

Also misplaced is Plaintiffs' reliance on cases where the alleged "unlawful entry and arrest" preceded the commencement of removal proceedings, the opposite of the facts of this case. *See, e.g.*, *Diaz-Bernal v. Myers*, 758 F. Supp. 2d 106, 124 (D. Conn. 2010) (holding the plaintiffs' claims were not barred by § 1252(g) because "the decision to commence removal proceedings against the plaintiffs was not made until after they had been the subject of allegedly unlawful entry and detention.")

[8] Plaintiffs try to have it both ways. They rely on *El Badrawi*, a case where the arrest was "initial" and occurred before the commencement of removal proceedings, but then also seek to distinguish *Gupta* because "Plaintiffs' removal proceedings had commenced long before the illegal seizures challenged here." Opposition at 13.

(emphasis added).[9] Those courts' reliance on facts contrary to those alleged here further demonstrates the applicability of § 1252(g) to bar Plaintiffs' claims.

3. § 1252(g) Bars Allegations Brought By All Alien Plaintiffs.

Plaintiffs imply, without support, a novel theory that the Court can distinguish between those claims brought by the alien Plaintiffs who were themselves subject to removal orders and claims brought by the other alien Plaintiffs. *See* Opposition at 5, 14. No such distinction is supported by the plain language of § 1252(g) or the cases applying it. § 1252(g) precludes jurisdiction over "any cause or claim by or on behalf of any alien arising from the decision or action by the Attorney General to commence proceedings, adjudicate cases, or execute removal orders against any alien under this chapter." 8 U.S.C. § 1252(g). The statute explicitly precludes jurisdiction for "any claim" brought by "any alien," not solely the alien who is the subject of the decision or action to commence proceedings or execute removal orders. Any contrary interpretation would nullify the multiple references to "any" in the statute, and would permit suits to survive simply by having the removed alien's spouse, child, or friend bring a claim. *See Guardado v. United States*, 744 F. Supp.

[9] Similarly inapt is Plaintiffs' reliance on *Polanco v. United States*, No. 10 CV 1705 SJ RLM, 2014 WL 795659, at *1 (E.D.N.Y. Feb. 27, 2014), a case brought by a lawful permanent resident who was arrested and detained for nine days even though no removal proceedings were ever commenced or final orders executed. This scenario is so distant from those at issue in this case as to make it wholly irrelevant.

2d 482, 487 (E.D. Va. 2010*); see also United States v. Gonzales*, 520 U.S. 1, 5 (1997) ("Read naturally, the section's word 'any' has an expansive meaning…").

B. Plaintiffs Fail to State a Claim For Relief.

1. False Imprisonment

Plaintiffs offer conclusory statements that the United States "lacked probable cause." It is insufficient for Plaintiffs to make this legal conclusion, they must allege specific facts that "allow[] the court to draw the reasonable inference that the defendant is liable for the misconduct alleged." *Ashcroft v. Iqbal*, 556 U.S. 662, 663 (2009). There is no dispute that the aliens subject to final removal orders were located in the homes entered by the ICE agents and were detained pursuant to those orders. *See* Complaint at ¶¶ 20-23, 71, 105; *see also* Exhibits A, B, C. No reading of the Complaint permits a reasonable inference that the ICE agents lacked probable cause to believe the aliens subject to final orders of removal were in the subject homes and were subject to arrest.

Plaintiffs make no effort to contend with 8 U.S.C. § 1357(a), which explicitly permits ICE agents, without warrant, "to interrogate any alien or person believed to be an alien as to his right to be or to remain in the United States " and to arrest any alien without a warrant if he has "reason to believe" the alien is in the United States illegally. *See also* 8 C.F.R. § 287.5. Plaintiffs do not allege that the removal orders

were invalid in any way, and nothing in Georgia law can render unlawful that which is permitted under federal statute. *Denson v. United States*, 574 F.3d 1318, 1348 (11th Cir. 2009) ("application of state law, to the extent it unavoidably conflicts with federal law, has no effect"); *see also Valencia–Mejia v. United States*, No. CV 08–2943, 2008 WL 4286979, at *5 (C.D.Cal. Sept. 15, 2008) (noting that immigration officers have a "lawful privilege" to arrest aliens, which bars a false imprisonment claim under California law); *Tovar v. United States*, No. 3:98–cv–1682, 2000 WL 425170, *7–8 (N.D. Tex. Apr. 18, 2000) (INS agents had "legal authority" to detain plaintiff under INA, barring false imprisonment claim under Texas law).

2. Trespass

Plaintiffs argue that their trespass claim survives because entrance into the homes constituted a "violation of the Constitution." *See* Opposition at 17. This again reveals that Plaintiffs are trying improperly to shoehorn allegations of constitutional violations into tort law claims. *See Federal Deposit Ins. Co. v. Meyer*, 510 U.S. 471, 478 (1994) (constitutional tort claim is not cognizable under jurisdictional grant of FTCA). Moreover, Plaintiffs' citations do not support their position. They cite to *Rosas v. Brock*, 826 F.2d 1004 (11th Cir. 1987), a class action § 1983 suit arising out of the denial of benefits under the Disaster Relief Act, which has no bearing on this case. Their reliance on *Mancha v. Immigration & Customs*

Enf't, No. 106-CV-2650-TWT, 2009 WL 900800 (N.D. Ga. Mar. 31, 2009), is also misplaced. There, the court analyzed whether the trespass claim was barred by the discretionary function question, but conducted no substantive legal analysis of Georgia trespass law. *Id.* at *4. The court certainly did not hold that "officers who enter a home and search it in violation of the Constitution can be liable for trespass in Georgia" (Opposition at 17), and Plaintiffs have no support for this contention.

3. Negligence

Plaintiffs assert a state law "duty by law enforcement officers to exercise ordinary care when conducting an arrest or seizure." *See* Opposition at 19. Plaintiffs mistakenly rely on a duty owed Georgia *governmental* entities, rather than a private person. The FTCA only "waives sovereign immunity 'under circumstances where the United States, if a private person,' not 'the United States, if a state or municipal entity,' would be liable." *United States v. Olson*, 546 U.S. 43, 45–46 (2005). Where "a plaintiff's effort to base liability [rests] solely upon the fact that a State would impose liability upon a municipal (or other state governmental) entity… nothing in the Act's context, history, or objectives or in the opinions of this Court suggest[s] a waiver of sovereign immunity solely upon that basis." *Id.* As Plaintiffs rely solely on a duty owed only by state government entities, their claim must be dismissed.

4. Intentional Infliction of Emotional Distress

Plaintiffs argue that a different standard applies to children, with a citation that says nothing of the sort, and repeat the allegations from the Complaint with greater vehemence. Plaintiffs do not demonstrate sufficiently outrageous conduct directed toward Plaintiffs J.A.M., Y.S.G.R., and J.I.G.R. The conduct is not sufficiently outrageous under applicable Georgia law, and intentional conduct "will not warrant a recovery for the infliction of emotional distress if the conduct was not directed toward the plaintiff." *Smith v. Stewart*, 660 S.E.2d 822 (Ga. App. 2008).

Plaintiffs also fail to make factual allegations sufficient to show severely distress, instead echoing only the complaint's conclusory assertion of unspecified "severe, lasting, and grave" harm. Opposition at 23. This is insufficient even at this stage of the proceedings. *See Jackson v. BellSouth Telecommunications*, 372 F.3d 1250, 1263 (11th Cir. 2004) ("To survive a motion to dismiss, plaintiffs must do more than merely state legal conclusions; they are required to allege some specific factual bases for those conclusions or face dismissal of their claims."); *Jones v. Fayette Family Dental Care, Inc.*, 718 S.E.2d 88, 91 (Ga. App. 2011) ("Emotional distress includes all highly unpleasant mental reactions such as fright, horror, grief, shame, humiliation, embarrassment, anger, chagrin, disappointment, worry, and nausea. It is only where it is extreme that liability arises.").

5. Negligent Infliction of Emotional Distress

Plaintiffs argue that physical impact is unnecessary where the conduct alleged is "malicious, willful, or wanton." But such a claim, alleging a higher level of culpability, is no longer a claim for negligent infliction of emotional distress. As the court held in *Clarke v. Freeman*: "A party claiming negligent infliction of emotional distress must therefore show a physical impact resulting in physical injury. On the other hand, where the defendant's conduct is malicious, wilful, or wanton, recovery can be had without the necessity of an impact." 692 S.E.2d 80, 84 (Ga. App. 2010). The court is distinguishing between two types of claims, which Plaintiffs have separately alleged. None of Plaintiffs' cases cited alter the impact requirement to proceed on a negligence theory, which Count V plainly alleges. Because Plaintiffs do not allege that the United States "caused plaintiff[s] any physical injury, a negligent infliction of emotional distress claim necessarily fails." *Bullard v. MRA Holding, LLC*, 890 F. Supp. 2d 1323, 1330-31 (N.D. Ga. 2012)

C. Plaintiffs May Not Recover Attorneys' Fees.

Plaintiffs claim "the FTCA specifically allows for attorneys' fees to be paid out of any settlement or recovery." Opposition at 25. This is irrelevant. Attorneys' fees, as a separate item of recovery as sought in Plaintiffs' Complaint, are unavailable. *See Joe v. United States*, 772 F.2d 1535 (11th Cir. 1985).

CONCLUSION

For all of the foregoing reasons, the United States requests that the Court dismiss the Complaint.

Respectfully submitted,

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The United States of America,	:	
Defendant.	:	

CERTIFICATE OF COMPLIANCE

I certify that the documents to which this certificate is attached have been prepared with one of the font and point selections approved by the Court in LR 5.1B for documents prepared by computer.

Respectfully submitted,

s/ Gabriel Mendel
Gabriel Mendel
Assistant U.S. Attorney

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The United States of America,	:	
Defendant.	:	

CERTIFICATE OF SERVICE

I certify that I electronically filed the within and foregoing with the Clerk of Court using the CM/ECF system.

This 30th day of March, 2018.

Respectfully submitted,

s/ Gabriel Mendel
Gabriel Mendel
Assistant U.S. Attorney