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6 *Listing of counsel continued on the next page*

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 VICTOR KALID JACOBO RAMIREZ; EDGAR  
 10 MICHEL GUEVARA ALCANTAR; on behalf of  
 themselves and others similarly situated, et al.,

11 Plaintiffs-  
 Petitioners,  
 12 vs.

13 KRISTI NOEM, Secretary, U.S. Department of  
 Homeland Security, in her official capacity; U.S.  
 14 DEPARTMENT OF HOMELAND SECURITY;  
 PAMELA J BONDI, Attorney General of the  
 United States, in her official capacity; TODD  
 15 LYONS, Acting Director for U.S. Immigration  
 and Customs Enforcement, in his official capacity;  
 U.S. IMMIGRATION AND CUSTOMS  
 16 ENFORCEMENT; JASON KNIGHT, Acting  
 Field Office Director, EXECUTIVE OFFICE FOR  
 IMMIGRATION REVIEW; SIRCE OWEN,  
 17 Acting Director for Executive Office of  
 Immigration Review, in her official capacity; LAS  
 VEGAS IMMIGRATION COURT; JOHN  
 18 MATTOS, Warden, Nevada Southern Detention  
 Facility, in his official capacity,

19 Defendants-  
 20 Respondents.

21 Case No.: 2:25-cv-02136

22 **PLAINTIFFS-PETITIONERS'**  
**MOTION FOR LEAVE TO FILE**  
**SUPPLEMENTAL AUTHORITIES**

1           MICHAEL KAGAN (12318C)  
2           ANDREW ELKINS  
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25           *\*Admitted pro hac vice*

1 Plaintiffs-Petitioners (“Plaintiffs”) hereby file this motion for leave to file supplemental  
 2 authorities relevant to the Court’s consideration of Plaintiffs’ Motion for Class Certification and  
 3 Appointment of Class Counsel [ECF No. 15] and Plaintiffs’ Reply to Defendants’-Respondents’  
 4 Response to Plaintiffs’-Petitioners’ Petition for a Writ of Habeas Corpus and Class Action  
 5 Complaint [ECF No. 55]. LR 7-2(g). Decisions in these three cases were all published after the  
 6 hearing on these matters in the morning of December 18, 2025.

7 **MEMORANDUM OF POINTS AND AUTHORITIES**

8 Good cause exists to grant the motion. Since briefing concluded on both matters and a  
 9 hearing was held on December 18, 2025, the following decisions have been issued:

- 10 • *Garro Pinchi v. Noem*, No. 25-CV-05632-PCP, --- F. Supp. 3d ----, 2025 WL 3691938  
   11 (N.D. Cal. Dec. 19, 2025) (order provisionally certifying class and staying agency action);  
   12 • *Guerrero Orellana v. Moniz*, No. 25-CV-12664-PBS, 2025 WL 3687757 (D. Mass. Dec.  
   13 19, 2025) (order granting plaintiff’s motion for partial summary judgment);  
   14 • *Maldonado Bautista v. Santacruz*, No. 5:25-cv-01873-SSS-BFM, 2025 LX 523334 (C.D.  
   15 Cal. Dec. 18, 2025) (amended order consolidating the court’s orders on motion for partial  
   16 summary judgment, class certification, and application for reconsideration or clarification);  
   17 and  
   18 • *Maldonado Bautista v. Santacruz*, No. 5:25-cv-1873, ECF No. 92 (C.D. Cal. Dec. 18,  
   19 2025) (order granting in part and denying in part Petitioners’ ex parte application for  
   20 reconsideration or clarification).

21 The cited decisions directly address the issues presented in this case and provide an analysis  
 22 of the specific questions the Court raised during the hearing held on December 18, 2025.

23 Copies of these authorities are attached hereto as Exhibits 1, 2, 3, and 4 respectively.

1 Dated: December 22, 2025.

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*Counsel for Plaintiffs-Petitioners*  
\*Admitted pro hac vice

## **CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing **PLAINTIFFS-PETITIONERS'** **MOTION FOR LEAVE TO FILE SUPPLEMENTAL AUTHORITIES** with the Clerk of the Court for the United States District Court of Nevada by using the court's CM/ECF system on December 22, 2025. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished on all participants by:

- CM/ECF  
 Electronic mail; or  
 US Mail or Carrier Service

Sadik  
ACLU of Nevada Counsel