

**ANDRES ORTIZ LAW**

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*Attorneys for Dabona Thang*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

Dabona Tang,

Petitioner,

v.

Kristi Noem, Secretary of the  
Department of Homeland Security;  
Todd M. Lyons, Acting Director of  
ICE; Ernesto Santa Cruz, Acting  
Director of Los Angeles ICE Field  
Office; Jose Casillas, SDDO ERO; R.  
Lee Immigration Officer

Respondents.

Case No.: 2:25-cv-04638

**REQUEST TO CORRECT THE  
RECORD**

Filed pursuant to FRCP 11(b)(3)

In the habeas petition, request for temporary restraining order, and the supplement to the motion for preliminary injunction, the Petitioner represented that he had not been arrested or convicted of any crime after his release from custody. On June 6, 2025, an Immigration and Customs Enforcement officer served the Petitioner with a Notice of Revocation of Release. See Exhibit 1- Notice of Revocation of Release. For the first time since the Petitioner's May 21, 2025 detention, ICE provided a reason for revoking the noncitizen's supervision. Specifically, ICE stated that the

Petitioner had been convicted under California Vehicle Code section 23152(b). *Id.*

Undersigned counsel was unaware of this fact at the time the habeas and related filings were filed. After receiving the Notice of Revocation of Release, undersigned counsel verified that the Petitioner was convicted in 2014 for violating California Vehicle Code section 23152(b). See Exhibit B-Superior Court of California Case Printout. Undersigned counsel apologizes to this court for not knowing this fact before filing the habeas petition and assures the court that not knowing this fact was unintentional.

Date: June 8, 2025

Respectfully submitted,

/s/ Andres Ortiz

Andres Ortiz, Esq.  
Andres Ortiz Law  
Attorney for the Petitioner

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing REQUEST TO CORRECT THE RECORD in *Dabona Tang v. Noem et. al*, with the Clerk of the Court for the Central District of California by using the appellate CM/ECF June 8, 2025, for filing and transmittal of Notice of Electronic Filing.

**/s/ Andres Ortiz**  
Andres Ortiz, Esq.  
Attorney for Petitioner

**REQUEST TO CORRECT THE RECORD**