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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

Leonel Navarrete Hernandez,	)	CASE NO.: 2:25-cv-05376-FWS-SK
	)	
Petitioner-Plaintiff,	)	
	)	SUPPLEMENTAL EXHIBIT IN
v.	)	SUPPORT OF RENEWED TRO
	)	APPLICATION
Todd Lyons, Acting Director,	)	
Immigration and Customs	)	
Enforcement;	)	
	)	Petitioner DHS No. A240-083-881
and	)	
	)	
Ernesto Santacruz Jr.,	)	
Los Angeles Field Office	)	
Acting Director, Immigration	)	
and Customs Enforcement,	)	
Enforcement and Removal	)	
Operations	)	
	)	
Respondents-Defendants.	)	

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**INDEX OF EXHIBITS**

<b>Exhibit</b>		<b>Page</b>
<b>G</b>	Declaration of Jean Reisz, June 15, 2025	1

1 Niels W. Frenzen (CA 139064)  
2 nfrenzen@law.usc.edu  
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11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 Leonel Navarrete Hernandez, ) CASE NO.: 2:25-cv-05376-FWS-SK  
14 )  
15 Petitioner-Plaintiff, )  
16 )  
17 v. )  
18 )  
19 Todd Lyons, Acting Director )  
20 Immigration and Customs )  
21 Enforcement; )  
22 )  
23 and )  
24 )  
25 Ernesto Santacruz Jr., )  
26 Los Angeles Field Office )  
27 Acting Director, Immigration )  
28 and Customs Enforcement, )  
Enforcement and Removal )  
Operations )  
Respondents-Defendants. )  
\_\_\_\_\_ )

1 I, Jean E. Reisz, declare as follows:

- 2 1. I am one of the attorneys representing Petitioner Leonel Navarrete Hernandez in  
3 this matter.
- 4 2. At 9:56 PM on June 15, 2025 I spoke with Petitioner's partner Evelyn Marcela  
5 Palacios Flores. She told me that Leonel (Petitioner) called her at around 1:30  
6 PM on June 15<sup>th</sup> and said he was in El Paso, Texas. He told her he was in a  
7 detention facility for deporting people.
- 8 3. He said he was taken from Los Angeles to Phoenix, then Colorado, then Texas.  
9 He was on a plane for ten hours before arriving in Texas because the plane had  
10 broken down.
- 11 4. He told her that officers at the El Paso detention facility told the detainees in El  
12 Paso something like "it didn't matter if they signed, they were going to be taken  
13 out of the country."
- 14 5. Petitioner told Marcela that it was hard for him to call anyone because he is  
15 only allowed three minutes on the phone. He told her that he may not be able to  
16 speak to her again.
- 17 6. He told her to say goodbye to his children for him.

18  
19 I declare under penalty of perjury that the foregoing is true and correct to the  
20 best of my knowledge. Executed at Los Angeles, CA on June 15, 2025.

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22  
23  
24  
25  
26  
27  
28

s/ Jean Reisz  
JEAN REISZ

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 15, 2025, I served a copy of this Petition for Writ of Habeas Corpus by email to the following individual:

Randy Hsieh  
Assistant U.S. Attorney  
U.S. Attorney's Office  
300 N. Los Angeles St., Ste. 7516  
Los Angeles, CA 90012  
Email: Randy.Hsieh@usdoj.gov

s/ Jean Reisz

Jean Reisz

Counsel for Petitioner