

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

FRICO JEAN (A209-867-571),) Case No. 6:25-cv-00970-JDC-DJA
VERSUS)
BRYAN PATTERSON, et al) Judge James D. Cain, Jr.
) Magistrate Judge Ayo

MOTION FOR LEAVE TO FILE RESPONSE TO RESPONDENTS'
MEMORANDUM OF LAW

On July 29, 2025, Respondents filed their Answer and Return to the Petition for Writ of Habeas Corpus, as well as a Memorandum of Law. Dkt. 17. Petitioner hereby moves this court for leave to file a Response to the Respondent's Memorandum of Law. This Court's Order of July 11, 2025, did not include a deadline for Petitioner's traverse; therefore, Petitioner requests the opportunity respond to the legal arguments made in Respondents' Memorandum of Law.

The Memorandum does not fully examine Temporary Protected Status, which is a status unique among all other immigration statuses or visas. Petitioner requests the opportunity to provide additional legal authority to the Court, and to clarify and respond to certain misstatements of law related to Temporary Protected Status in Respondents' Memorandum.

Prior to filing the instant Motion, Petitioner contacted counsel for Respondents, Assistant U.S. Attorney Karen King, who indicated that the Respondents will not take a position on the Motion for Leave and will not file an opposition.

Dated: July 31, 2025

Respectfully Submitted,

Petitioner Frico Jean

By: /s/ Erin C. Cobb

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