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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

M-S-L, an adult,

Case No. 6:25-cv-01204-AA

Petitioner,

v.

NOTICE OF SUPPLEMENTAL
AUTHORITY IN SUPPORT OF
HABEAS RELIEF

DREW BOSTOCK, et al,

Respondents.

Petitioner, M-S-L, submits the attached supplemental authority and asks that this Court concur with the *Ayala* court in noting “the problematic timing of ICE’s ‘secondary review’ conducted after litigation began.” *ARTURO SEPULVEDA AYALA, Petitioner, v. PAMELA BONDI, et al., Respondents.*, No. 2:25-CV-01063-JNW-TLF, 2025 WL 2209708, at *4 (W.D. Wash. Aug. 4, 2025).

Notably, like here, in *Ayala*, “the day after this matter became ripe for consideration, the Government filed a declaration indicating USCIS issued a notice of intent to revoke Sepulveda Ayala’s deferred action.” *Id.* But that post-hoc development did not alter the Court’s analysis. Rather, the post-hoc nature of the notice (created only *after* habeas proceedings were underway) “reinforce[d the court’s] concerns about the Government’s shifting litigation positions.” *Id.*

Respectfully submitted August 8, 2025,

s/ Kurt Hermansen

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