

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

BAO PHONG HUU NGUYEN

PETITIONER,

v.

KRISTI NOEM, et al.,

RESPONDENTS.

Civil Case No. 3:25-cv-1913-L

PETITIONER'S MOTION FOR LEAVE TO FILE AMENDED DOCUMENTS

Petitioner, Bao Nguyen, by and through undersigned counsel, files this motion asking for this Court's leave to file amended documents in this case. On July 24, 2025, Petitioner, a pre-1995 Vietnam immigrant, filed a habeas petition and corresponding emergency Temporary Restraining Order asking this Court to release him from the custody of U.S. Immigration and Customs Enforcement ("ICE"). This Court has yet to rule on this case.

The purpose of amended filings is straightforward: The status of the law for these cases is changing extremely fast due to the current political climate. District courts throughout the country, and this district, are handing down opinions constantly. Petitioner deserves the chance for his case to be reviewed with the most updated information and case law that undersigned counsel can include. Specifically, Petitioner is requesting to file an amended motion for a Temporary Restraining Order and/or a Preliminary Injunction; an amended habeas petition; and an amended appendix. These documents would amend the previous filings on this case's docket filed July 24, 2025. ECF 1 & 3.

For this reason, Petitioner Bao Nguyen asks this Court permission for leave to file amended documents in his case.

RESPECTFULLY SUBMITTED,

/s/ Dan Gividen

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Certificate of Conference

I hereby certify that I spoke with AUSA Ann Cruce-Haag, and she does not oppose this motion.

/s/ Dan Gividen

DAN GIVIDEN

Attorney for Petitioner

Certificate of Service

I hereby certify on October 1, 2025, I electronically filed this document, and a copy was served on all counsel of record via this Court's ECF system.

/s/ Dan Gividen

DAN GIVIDEN

Attorney for Petitioner