

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

RALPH BRONSON FILS-AIME

Petitioner,

v.

E.L. TATUM, JR., Warden of the Federal Correctional Institute, Berlin; **PATRICIA H. HYDE**, Acting Field Office Director of the Immigration and Customs Enforcement, Enforcement and Removal Operations, Boston Field Office; **TODD LYONS**, Acting Director, U.S. Immigration and Customs Enforcement; **KRISTI NOEM**, Secretary of U.S. Department of Homeland Security; **PAMELA BONDI**, U.S. Attorney General;

Respondents.

Case Number: 1:25-cv-287-JL-TSM

JOINT STATUS REPORT AND PROPOSED BRIEFING SCHEDULE

The parties hereby submit this joint status report on Petitioner's removal proceedings in Immigration Court, held on October 8, 2025, and October 9, 2025, and a proposed schedule for further briefing.

After proceedings on October 8, 2025, on October 9, 2025, the Immigration Judge (IJ) at the Chelmsford Immigration Court in Massachusetts granted the statutory withholding of removal with respect to Haiti for a second time, denied asylum for Haiti based on the one-year deadline, and did not reach protection under the Convention Against Torture ("CAT"). In addition, the IJ denied Petitioner's applications for asylum, statutory withholding of removal, and protection under

CAT with respect to Mexico based on the merits of his claims. *See* Exhibit 1 (10/09/2025 Order of the Immigration Judge.)

On October 10, 2025, Petitioner appealed the IJ’s decision to the Board of Immigration Appeals (“BIA”). *See* Exhibit 2 (eFiled Appeal Package). Petitioner also updated the First Circuit about the proceedings in Immigration Court and appeal to the BIA. *See* Exhibit 3 (Petitioner’s Status Report).

Because Petitioner has appealed the IJ’s decision, his order of removal is not yet final, and he continues to be detained under 8 U.S.C. § 1225(b).

Counsel for parties have conferred, and in light of the IJ’s decision, Respondents would like to file supplemental briefing not to exceed 10 pages. The parties have agreed on the following schedule, subject to the Court’s approval:

Briefing	Due Date
Respondents’ Supplemental Brief	October 17, 2025
Petitioner’s Response to Respondents’ Supplemental Brief	October 24, 2025

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Respectfully submitted,

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By and through his Counsel,

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