

1 TODD BLANCHE
Deputy Attorney General of the United States
2 SIGAL CHATTAH
First Assistant United States Attorney
3 District of Nevada
Nevada Bar No. 8264
4

5 SUMMER A. JOHNSON
Assistant United States Attorney
CHRISTIAN R. RUIZ
6 Assistant United States Attorney
VIRGINIA T. TOMOVA
7 Assistant United States Attorney
Nevada Bar No. 12504
8 501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
9 Phone: (702) 388-6336
Fax: (702) 388-6336
10 Summer.Johnson@usdoj.gov
11 Christian.Ruiz@usdoj.gov
Virginia.Tomova@usdoj.gov
12 *Attorneys for the Federal Respondents*

13 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

14 Miguel Angel Maldonado Vazquez,
15 Plaintiff,

16 v.

17 Thomas Feeley, acting Field Office Director
of the Salt Lake City Field Office of U.S.
18 Immigration & Customs Enforcement's
Enforcement and Removal Operations
19 division; John Mattos, Warden, Nevada
Southern Detention Center; Kristi Noem,
20 Secretary, United States Department of
Homeland Security; United States
21 Department of Homeland Security; Pamela
Bondi, Attorney General of the United
22 States; Sirce Owen, Director of Executive
Office for Immigration Review, et al.
23

24 Defendants.

Case No. 2:25-cv-01542-RFB-EJY

**Federal Respondents' Second Updated
Status Report in Compliance with a
Court's Order (ECF No. 43)**

25 The Federal Respondents respectfully submit this Second Updated Status Report
26 regarding their efforts to comply with the Court's Order (ECF No. 43), which directed that,
27 *inter alia*,
28

- 1 1. On or before November 7, 2025, Respondents provide a description of how the
2 sources of the requested information for each of the 185 detainees are stored,
3 accessed, and maintained—including, but not limited to, any arrest warrant, Notice
4 to Appear (NTA), Form I-286, and Form I-213—whether maintained electronically
5 within the EOIR-CASS (E-CASS) system or otherwise. The Court further requested
6 that Respondents provide an exemplar illustrating how such documents are stored
7 for an individual detainee. *Id.*
- 8 2. The appearance of one representative from DHS/ICE who can describe how the
9 agency identified the 185 detainees and how the requested information is stored.

10
11 Federal Respondents conferred today with DHS to obtain an update regarding the
12 information requested above. The documents identified for disclosure by the Court, that are
13 most reliably accessible to the individuals who would be responsible for conducting the
14 search, copying, and/or digitization of records, are contained within each detainee's A-File.
15 While certain documents may also be available through court filings in E-CASS or other
16 electronic systems, not all of the requested materials are stored there, and ERO does not
17 have full access to every system that may contain copies of the requested records. Based on
18 current information, the A-File remains the most comprehensive and consistently accessible
19 repository for all documents sought in discovery and one that can be directly accessed by
20 ERO personnel.

21 There is no exemplar for the Court concerning the A-File. It is a physical file which
22 is located locally during the detention of the detainee. A representative from DHS will be
23 present to address the Court's questions concerning how the requested information is stored,
24 maintained and retrieved.

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