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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA
PHOENIX DIVISION
IMMIGRATION CASE**

Bo Li .

Plaintiff,

v.

JOHN CANTU, ET AL

Defendants,

Civil No.: 2:25-cv-02989-SPL--CDB

**SUPPLEMENTAL
DECLARATION OF BEN
LOVEMAN IN SUPPORT OF
MOTION FOR TRO AND
PRELIMINARY INJUNCTION
AND NOTICE OF SUPPLEMENTAL
AUTHORITY**

1 I, Ben Loveman, do hereby declare:

2 1. I am a partner at Reeves Immigration Law Group, located at 425 California Street,
3 Suite 1250 San Francisco, CA 94104. I have personal knowledge of the matter stated
4 herein because I am the attorney for Plaintiff and have communicated with Plaintiff
5 and his family. Additionally, I am attaching supplemental authority from a District Court
6 ruling in Aceros v. Kaiser, No. 25-cv-06924-EMC (EMC), 2025 LX 330524 (N.D. Cal.
7 Sep., 12, 2025) because the facts of that case mirror the circumstances here and the
8 decision contains thorough and, possibly useful, analysis of the arguments presented by
9 Plaintiff and Respondents in this case. **Exhibit A.**

10 2. Plaintiff continues to suffer irreparable harm as a result of his detention. He has
11 described worsening depressive feelings, hopelessness, and worsening anxiety.

12 3. Plaintiff is expecting his first child in November of this year. He fears not being able to
13 welcome his child into the world and not being able to provide aid and support for his
14 wife in her final days before bringing their child into this world and through the birth.
15

16
17 Dated: September 18, 2025,

Respectfully,

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19 /s/Ben Loveman

20 Ben Loveman

21 Attorney for the Plaintiff
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EXHIBIT A



User Name: Ben Loveman

Date and Time: Thursday, September 18, 2025 12:34 PM PDT

Job Number: 263145176

Document (1)

1. *Aceros v. Kaiser*

Client/Matter: ddd

Search Terms:

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