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7 *Attorneys for the Federal Respondents*

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9 **UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

10 Jorge Javier Rodriguez Cabrera,

11 Plaintiff,

12 v.

13 John Mattos, Warden; Nevada Detention  
Center; Jason Knight, Director of Salt Lake  
14 City Field Office; U.S. Immigration and  
Customs Enforcement; Pamela Bondi,  
15 Attorney General of the United States; and  
16 Kristi Noem, Secretary of Homeland  
Security, in their official capacities,

17 Respondents.

Case No. 2:25-cv-01551-RFB-EJY

**Federal Respondents' Response to  
Notice of Developments Subsequent to  
October 30, 2025 Hearing (ECF No. 35)**

18 Federal Respondents' Counsel submits the following as a response to Notice of  
19 Developments Subsequent to October 30, 2025 Hearing filed by Petitioner's Counsel. ECF  
20 No. 35.

21 The representations made by Respondents' Counsel at the October 30, 2025,  
22 hearing were consistent with information contained in Petitioner's Reply as outlined  
23 specifically on page 2, footnote 1. ECF No. 29. In Petitioner's Reply, it stated, "After this  
24 habeas petition was filed, the immigration judge indicated an intent to grant Petitioner's  
25 adjustment of status, and DHS indicated it would not appeal, conditioned on the  
26 completion of final security checks." See page 2, footnote 1 ECF No. 29. These  
27 representations made by Respondents' Counsel at the October 30, 2025 hearing were

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1 truthful, consistent and made directly from Petitioner's own Reply based on available and  
2 current information at the time of the hearing.

3 Petitioner's Notice failed to mention that information stated by Respondents'  
4 Counsel at the October 30, 2025 hearing came directly from Petitioner's own Reply  
5 specifically on page 2, footnote 1. ECF No. 29.

6 Respectfully submitted this 5th day of November 2025.

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8 SIGAL CHATTAH  
Acting United States Attorney

9 /s/ Tamer B. Botros  
10 TAMER B. BOTROS  
Assistant United States Attorney  
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Certificate of Service

I, Cortney Bivens, certify that the **Federal Respondents' Response to Notice of Developments** was served this date via U.S. Mail and electronic mail to the following:

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Dated this 5th day of November 2025.

/s/ Cortney Bivens  
Cortney Bivens  
Paralegal