

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

My Anh NGUYEN,

Petitioner,

v.

Polly KAISER, Acting Field Office Director of San Francisco Office of Detention and Removal, U.S. Immigrations and Customs Enforcement; U.S. Department of Homeland Security; Todd M. LYONS, Acting Director, Immigration and Customs Enforcement, U.S. Department of Homeland Security; Kristi NOEM, in her Official Capacity, Secretary, U.S. Department of Homeland Security; and Pam BONDI, in her Official Capacity, Attorney General of the United States;

Respondents.

Case No. 03:25-cv-07100 VC

**DECLARATION OF R. LINUS CHAN IN  
SUPPORT OF PETITION FOR WRIT OF  
HABEAS CORPUS AND COMPLAINT  
FOR  
DECLARATORY AND INJUNCTIVE  
RELIEF**

I, R. Linus Chan, declare the following is true and accurate to the best of my knowledge:

1. I am an immigration attorney based in the Minneapolis area of Minnesota. I am the Director of the Detainee Rights Clinic at the Binger Center for New Americans at the University of Minnesota Law School.
2. I represent Petitioner My Anh Nguyen on both his pardon application with the Minnesota Pardon Board and on a Motion to Reopen at the Minnesota Immigration Court.
3. I have personal knowledge of all facts stated herein. They are based on my direct involvement, communications, and review of documentation related to Mr. Nguyen's immigration case. I affirm the following information to be true and accurate to the best of my knowledge as an officer of the Court.
5. Attached to this declaration are true and correct copies of the following:

Exhibit #	Description
A	Letter of Support from Kim Nguyen Ex-Wife of Mr. Nguyen
B	Letter of Support from Khai Nguyen Father-in-Law of My Nguyen
C	Letter of Support from Crystal Nguyen Sister of My Nguyen
D	Letter of Support from Professor Sabrina Thomas
	<b>Immigration Documents</b>
E	Notification of Release from ICE (3/10/2011)
F	ICE check-in records
G	Notice To Appear (10/26/2006)
H	Record of Deportable Alien I-213
I	Vietnamese Embassy denies travel document (12/21/2010)
J	Order of Change in Custody Status (12/14/2006)
K	Order to Appear Deferred Determination
L	Letter Requesting Immediate Release (1/24/2011)
	<b>Family Documentation and Identity Document</b>
M	Marriage Certificate of My Anh Nguyen and Linh Nguyen
N	Olivia Nguyen Birth Certificate
O	Alexander Bao Nguyen Birth Certificate
P	John Francis Hendricks Jr. Birth Certificate
Q	John Francis Hendricks Statement of Parentage
R	Final Certificate of Parentage Analysis
S	Letter from Francis Hendricks Jr.
T	Laissez-Passer Document for My Anh Nguyen
U	Resident Alien ID
V	Linh Nuyen Certificate of Naturalization
W	Transcripts for Olivia Nguyen

X	Transcripts for Alexander Nguyen
Y	Medical record of Linh Nguyen
	<b>Criminal Documents</b>
Z	Plea Transcript 27 CR-02-066377 December 2002
AA	Pardon Application Receipt August 18, 2025
BB	Appellate Decision for 27 CR-02-066377 Post Conviction Petition
	<b>Local Authority</b>
CC	Hoac v. Becerra et al., No. 2:25-cv-01740-DC-JDP Order Granting Petitioner's Motion For Temporary Restraining Order And Motion For Preliminary Injunction (No.23)
DD	Phan v. Becerra, No. 2:25-CV-01757-DC-JDP Order Granting Petitioner's Motion For Temporary Restraining Order And Motion For Preliminary Injunction (No.16)
EE	Guillermo M.R. v. Kaiser et al., No. 25-cv-05436-RFL Order Granting Preliminary Injunction
FF	Diaz v. Kaiser, No. 3:25-cv-05071 Order Granting Ex Parte Temporary Restraining Order; And Order To Show Cause Why Preliminary Injunction Should Not Issue [Re: Dkt. No. 2]
GG	T.P.S v. Kaiser, No. 3:25-cv-05428 Order Granting Ex Parte Temporary Restraining Order; And Order To Show Cause Why Preliminary Injunction Should Not Issue [Re: ECF 2]
HH	Garcia v. Andrews, No. 2:25-cv-01884-TLN-SCR Order
II	Singh v. Andrews, No. 1:25-cv-00801-KES-SKO (HC) Order Granting Preliminary Injunction (Doc. 5)
JJ	Guidance Regarding Third Country Removals USCIS (3/30/2025)
KK	Memorandum to ICE Post DVD decision
LL	Ortega v. Kaiser, Order Granting TRO
MM	J.R. v. Bostock, TRO order granting
NN	Delkash v. Noem Ex Parte TRO Grant

OO	Vaskanyan v. Janecka TRO partial Grant
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Dated: August 27, 2025

*s/ R. Linus Chan*

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Linus Chan, Reg. No. 0403311  
**JAMES H. BINGER CENTER FOR NEW  
AMERICANS, UNIVERSITY OF MINNESOTA  
LAW SCHOOL**  
190 Mondale Hall  
229 19th Street South  
Minneapolis, MN 55455  
[rlchan@umn.edu](mailto:rlchan@umn.edu)  
(612) 301-1156

*Attorneys for Petitioner*