

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 25-cv-61814-RS

YOEL PITALUGA,
DAYAMI ROLDAN,

Petitioners,

v.

GARRETT RIPA, MIAMI ICE FIELD OFFICE
DIRECTOR, *et al*

Respondents.

PLAINTIFF'S NOTICE OF FILING SUPPLEMENTAL AUTHORITY

Petitioner, by and through the undersigned, files this notice of supplemental authority relating to the status and import of highly relevant litigation referenced by both parties.

1. *Coalition for Humane Immigrant Rights (CHIRLA) et al. v Kristi Noem et al.* 25-cv-00872-JMC (D.DC 2025) (D.E. 22) (Motion in which “Plaintiffs seek an order immediately postponing and staying the effective dates of implementation and enforcement of the January 23 Huffman Memorandum, February 18 ICE Directive, and March 25 Parole Termination Notice for Cubans, Haitians, Nicaraguans, and Venezuelans (CHNV) insofar as they subject individuals who have previously been granted parole at ports of entry to expedited removal.”)
2. *Coalition for Humane Immigrant Rights (CHIRLA) et al. v Kristi Noem et al.* 25-cv-00872-JMC (D.DC 2025) (D.E. 41) (District Court Order granting foregoing motion, stating “for the foregoing reasons, Plaintiffs’ motion for a stay of agency action, ECF 22, is GRANTED. The Challenged Actions (the January 23 Huffman Memorandum, February 18 ICE Directive, and March 25 CHNV Termination Notice) are hereby

STAYED, pending conclusion of these review proceedings, to the extent the Challenged Actions subject to expedited removal individuals who have been, at any time, paroled into the United States at a point of entry.”)

3. *Coalition for Humane Immigrant Rights (CHIRLA) et al. v Kristi Noem et al* No. 25-5289 (DC Cir. 2025) No. 25-5289 (Circuit Court decision dissolving an administrative stay pending appeal, restoring the foregoing district court stay indicating that “Appellants [the government] have not satisfied the stringent requirements for a stay pending appeal. *See Nken v. Holder*, 556 U.S. 418, 434 (2009); *D.C. Circuit Handbook of Practice and Internal Procedures* 33 (2025). Specifically, appellants assert that the district court’s order will cause the government irreparable harm if the order precludes the government from applying expedited removal to parolees, notwithstanding 8 C.F.R. §§ 1.2 [relating to aggravated felons] and 235.3(b)(1)(i) [relating to arriving aliens at the border]. But appellants make no assertion that the district court’s order does so. Consequently, appellants have not shown that a stay is necessary to prevent irreparable harm. *See KalshiEX LLC v. CFTC*, 119 F.4th 58, 64 (D.C. Cir. 2024) (“[A] showing of irreparable harm is a necessary prerequisite for a stay.”)”)

Respectfully submitted,

Dated: September 24, 2025

s/ Felix A. Montanez

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