

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 SECOND NOTICE OF FILING SUPPLEMENTAL AUTHORITY

Plaintiffs, by and through the undersigned, file this second notice of supplemental authority:

1. *Javier Tomas Munoz Materano v. Paul Aretata*, et al. No. 25-cv-6137 (ER), 2025 WL 2630826 (S.D.N.Y Sept. 12, 2025) (following *CHIRLA v. Noem* and awarding habeas relief, because §1225 does not authorize expedited removal of individuals who have ever been paroled into the U.S. under either of its provisions [designation or for aliens who are 'arriving.'])
2. *Make the Rd. New York v. Noem*, No. 25-cv-190 (JMC), 2025 U.S. Dist. LEXIS 169432, 2025 WL 2494908 (D.D.C. August 29, 2025) (holding that arresting noncitizens for expedited removal within the interior of the United States in all locations not within 100 air miles of a land border violates due process.)

Respectfully submitted,

Dated: October 1, 2025

s/ Felix A. Montanez

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