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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA (Las Vegas)**

14 **E.C.**

Case No.: 2:25-cv-01789-RFB-BNW

15
16 *Petitioner,*

17 v.

18 **KRISTI NOEM, U.S. DEPARTMENT OF**
HOMELAND SECURITY, PAMELA J.
19 **BONDI, U.S. DEPARTMENT OF**
JUSTICE, TODD LYONS, JASON
20 **KNIGHT, U.S. IMMIGRATION AND**
CUSTOMS ENFORCEMENT and JOHN
21 **MATTOS,**

22 *Respondents.*
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JOINT STATUS REPORT
PURSUANT TO ORDER GRANTING
PETITIONER'S PRELIMINARY
INJUNCTION (ECF No. 19)
AND STIPULATION
AND ORDER
OF DISMISSAL

1 Petitioner E.C (“Petitioner”) and Federal Respondents (“Respondents”), by and through
2 their undersigned counsel, hereby submit this Joint Status Report pursuant to this Court’s Order
3 Granting Petitioner’s Preliminary Injunction. ECF No. 19. Petitioner and Federal Respondents,
4 by and through their respective counsel, also stipulate to the dismissal without prejudice of each
5 and every cause of action alleged in the Petition for Writ of Habeas Corpus filed in this case
6 (ECF No.1), each party to bear its own fees and costs.
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8 **MEMORANDUM OF POINTS AND AUTHORITIES**

9 **I. Background**

10 On September 22, 2025, Petitioner filed a Petition for Writ of Habeas Corpus pursuant
11 to 18 U.S.C. § 2241. ECF No. 1. The same day, Petitioner filed a Motion for Protective Order,
12 ECF No. 3, as well as a Motion for Temporary Restraining Order (TRO). ECF No. 4. On
13 September 23, this case was randomly assigned to Chief Judge Andrew P. Gordon and
14 Magistrate Judge Brenda Weksler. The same day, in accordance with Local Rule 42-1 and
15 Federal Rule of Civil Procedure 42(a), this case was transferred to this Court based on the
16 common questions of fact and law raised in the instant Petition and in *Maldonado Vazquez v.*
17 *Feeley*, Case No. 2:25-cv-01542-RFB-EJY. ECF No. 5. On September 24, this Court issued a
18 minute order to seal the case in its entirety, pending future orders. ECF No. 6. The same day,
19 this Court served Respondents. ECF No. 7. On September 26, Respondents appeared in the case
20 and filed a stipulation for extension of time to respond. ECF No. 9. On October 1, Respondents
21 filed their Opposition to the Motion for TRO. ECF No. 13. On October 3, Petitioner filed his
22 Reply in Support of the Motion for TRO. ECF No.14.
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1 This Court granted a Preliminary Injunction on October 14, 2025 ordering that Petitioner
2 receive a bond hearing in Immigration Court within seven days, or in the alternative to be
3 immediately released. ECF No. 19.

4 **II. Status Report**

5 On October 20, 2025, the Las Vegas Immigration Court held a bond hearing for
6 Petitioner, with Judge Daugherty as the presiding Immigration Judge ("IJ"). Judge Daugherty
7 ruled that Petitioner be released from custody on the statutory minimum bond in the amount of
8 \$1,500.00 and ATD at the direction of DHS. DHS waived appeal.
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10 Petitioner posted bond on October 21 and was released on October 22.

11 **III. Joint Stipulation**

12 In this case, the parties agree that the Petition for Writ of Habeas Corpus (ECF No. 1) is
13 moot. Petitioner filed his Petition to obtain a bond hearing under 8 U.S.C. § 1226 (a) ("Section
14 1226 (a)"), rather than mandatory detention without opportunity for a bond hearing under 8
15 U.S.C. § 1225 (b) (2) ("Section 1225 (b) (2)"), or 8 U.S.C. § 1226 (c) ("Section 1226 (c)").
16 Because the IJ held a bond hearing pursuant to this Court's order and compliant with Section
17 1226 (a), the issues raised by this Petition are now moot. This stipulation does not indicate
18 concession of any issues raised by the parties.
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21 **IV. Conclusion**

22 For the foregoing reasons, counsel for Petitioner and Federal Respondents have
23 conferred regarding the petition for Writ of Habeas Corpus and agreed to its dismissal.
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1 Respectfully submitted this 24th day of October 2025,

2 SIGAL CHATTAH
3 Acting United States Attorney

/s/Michael Kagan
Michael Kagan
Nevada Bar No. 12318C

4 /s/ Virginia Tomova
5 Virginia T. Tomova
6 Assistant United States Attorney
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Drianna Dimatulac
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7 /s/Yilu Song
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