

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

VICTORIANO RAMOS SAPON, )  
Petitioner, )  
v. )  
KRISTI NOEM, Secretary, U.S. Department of ) Case No. 1:25-cv-11731  
Homeland Security; SAMUEL OLSON, Field )  
Office Director, Chicago Field Office, Immigration )  
and Customs Enforcement, )  
Respondents. )  
Judge Chang

**JOINT STATUS REPORT**

1. Petitioner is presently detained at Clay County Jail located in in Brazil, Indiana. The Petition for Habeas Corpus filed on September 26, 2025, sought an order from this Court directing Respondents to conduct a bond hearing to ensure his due process rights.
2. After reviewing Respondents' September 29, 2025 filings, Petitioner has determined that it will be necessary for him to amend his complaint pursuant to Rule 15(a)(1) of the Federal Rules of Civil Procedure.
3. Petitioner intends to file his amended complaint no later than Friday October 3, 2025.
4. Respondents oppose amendment because, for the multiple reasons included in the memorandum supporting their return, Dkt. 8, there is no jurisdiction here. The petitioner's removal from this country has already been delayed by his filing the petition and this court's stay (issued before respondents could even apprise the court of the multiple jurisdictional flaws with this case). Such litigation tactics are *precisely* the reason Congress did not want district courts to interfere with the execution of removal orders. *See* 8 U.S.C. § 1252(g).
5. Petitioner requests that the Court extend its order directing Respondents not to transfer

Petitioner out of Illinois, Wisconsin or Indiana during the pendency of these proceedings to preserve jurisdiction and access to counsel.

6. The Respondents propose that briefing continue on the habeas petition, with Respondents' response having already been filed on September 29, 2025 (*see* Dkt. Nos. 7 and 8) and Petitioner's reply due by October 3, 2025.

Respectfully Submitted,

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