

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

E.V. and M.F.E.

Petitioners-Plaintiffs,

v.

KEVIN RAYCRAFT, Director of the Detroit Field Office for U.S. Immigration and Customs Enforcement, in his official capacity; **TODD LYONS**, Acting Director of U.S. Immigration and Customs Enforcement, in his official capacity; **KRISTI NOEM**, Secretary of the U.S. Department of Homeland Security, in her official capacity; **PAMELA BONDI**, Attorney General of the United States, in her official capacity; **U.S. DEPARTMENT OF HOMELAND SECURITY**; and **EXECUTIVE OFFICE FOR IMMIGRATION REVIEW**,

Respondents-Defendants.

Case No. 25 - 2069

Hon. PEARSON
Mag. CLAY

PETITIONERS' SUBMISSION OF SUPPLEMENTAL AUTHORITY

Pursuant to an instruction from the Court during the hearing held earlier today on Petitioners' Motion for a Temporary Restraining Order, Petitioners submit the following supplemental authority:

- *Munoz Materano v. Arteta*, No. 25 CIV. 6137 (ER), 2025 WL 2630826, at *11 (S.D.N.Y. Sept. 12, 2025) ("This Court joins [*CHIRLA*] in holding that § 1225 does not authorize expedited removal of individuals who have ever been paroled into the U.S.");

- *Espinoza v. Kaiser*, No. 1:25-CV-01101 JLT SKO, 2025 WL 2675785, at *5 (E.D. Cal. Sept. 18, 2025) (“[CHIRLA] concluded that the statute ‘forbids the expedited removal of noncitizens who have been, at any point in time, paroled into the United States.’”);
- *Castellon v. Kaiser*, No. 1:25-CV-00968 JLT EPG, 2025 WL 2373425, at *4 (E.D. Cal. Aug. 14, 2025) (same);
- *Salazar v. Kaiser*, No. 1:25-CV-01017-JLT-SAB, 2025 WL 2456232, at *4 (E.D. Cal. Aug. 26, 2025) (same);
- *Garcia v. Andrews*, No. 1:25-CV-01006 JLT SAB, 2025 WL 2420068, at *4 (E.D. Cal. Aug. 21, 2025) (same);
- *N.A. v. LaRose*, No.: 25-cv-2384-RSH-BLM (S.D. Cal.) (finding jurisdiction to challenge Petitioner's placement in expedited removal proceedings despite the "various provisions of 8 U.S.C. § 1252");
- *Sanchez Ballestros v. Noem*, 25-cv-594-RGJ (W.D. Ky.) (reincorporating and affirming its decision in *Patel v. Tindall*, 2025 WL 2823607, at *2-4 (W.D. Ky. Oct. 3, 2025) (holding that “an individual who has been paroled without first having been placed in expedited removal *cannot later be designated for expedited removal*”).

Respectfully submitted,



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Dated: October 14, 2025

CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2025, a true and correct copy of the foregoing document was electronically filed via the Court's CM/ECF system which sends notice of electronic filing to all counsel of record.

/s/ Brian J. Hoffman

Brian J. Hoffman