

FILED BY *MP* D.C.

NOV 10 2025

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - MIAMIUNITED STATES DISTRICT COURT
SOUTHERN DISTRICT, MIAMIRAFAEL CENDAN,
Petitioner,

V.

Case:25-24543-CIV-RUIZ

KRISTI NOEM, Secretary of
Department of Homeland Security,
CHARLES PARRA, Field Director at Krome,
JOSE SIERRA, Field Manager,
MR. RIVAS Deportation Officer for Cubans,
Respondents.MOTION TO AMEND AND SUPPLEMENTAL PLEADINGS ON WRIT OF CASE
CITED ABOVE, PURSUANT TO FED.R.CIV.PR. RULE 15(a)(2).

Pro-Se petitioner files this motion to amend pleadings and correct deficient law. Rule 15 (a)(2) states the court should freely give leave when justice so requires. Petitioner's case is a perfect example of the aforementioned above. Petitioner stands to suffer irreparable injury and extreme unusual hardship by to amend his petition of stay of deportation or removal and present credible proof of all of the disabilities and chronic medical conditions. Petitioner also suffers from P.T.S.D, post traumatic stress disorder, a result of trauma during his voluntary enlistment with the United States Army. All of the medical chronic issues and disabilities are documented and confirmed by the U.S. Immigration and Customs Enforcement Medical Department. Furthermore, petitioner respectfully requests that this honorable judge takes into account that petitioner is not an experienced litigator, any deficiencies and applications of law are due to ignorance of immigration and fed. r. civ.pr. and this motion to amend is made in Good Faith in order to achieve justice.

Respectfully Submitted,

Sign: 
Name: RAFAEL CENDAN

CERTIFICATE of SERVICE

I Certify under penalty of perjury that a true and correct copy of the foregoing document has been placed in the hands of U.S. Mail officials at Krome Service processing center for mailing VIA-U.S.POSTAL SERVICE to the parties Listed below.

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UNITED STATES ATTORNEYS OFFICE
SOUTHERN DISTRICT OF FLORIDA
500 EAST BROWARD BLVD., SUITE 700
FT.LAUDERDALE,FLORIDA 33394

Day Executed
11-04 -2025

Sign: 
Name:RAFAEL CENDAN

Rafael Cendán, A.E.
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