

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA

CHANTHILA SOUVANNARATH,

Petitioner,

v.

U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT, *et al.*,

Respondents.

Civil Action No.
25-cv-938-SDD-SDJ

**PETITIONER'S REPLY IN SUPPORT OF HIS MOTION TO ENFORCE THE
COURT'S TEMPORARY RESTRAINING ORDER, DKT. 4**

INTRODUCTION

The operative matter before this Court *right now* is whether Respondents were willfully blind to the two-fold fact that district courts have jurisdiction to (a) decide their own jurisdiction (they do) and (b) issue *ex parte* temporary restraining orders (“TROs”) that preserve the status quo (they do). *See* Fed. R. Civ. P. 65(b)(1). It follows that this Court maintains jurisdiction to enforce the TRO it issued on October 23, 2025 and preserve the status quo ante. Contrary to Respondents’ argument, this Court has jurisdiction to fashion a remedy to ensure that its doors remain open to Petitioner so that his claims can be fully heard and adjudicated. Accordingly, Petitioner asks this Court to exercise its inherent authority under the 28 U.S.C. § 1651, the All Writs Act (“AWA”), and order his return.

ARGUMENT

Respondents make three fundamental errors in opposition to Petitioner’s Motion to Enforce. *First*, Respondents argue that this Court does not have jurisdiction under the All Writs Act to order Petitioner’s return. But there is no dispute that Petitioner properly served his *pro se* habeas petition and emergency motion for a TRO on Respondents. This unequivocally placed them on notice that an *ex parte* TRO could issue at any time, of which they would have been immediately apprised had they simply entered a notice of appearance on the docket. Willful blindness does not qualify as an excuse to ignore a court order which, in any event, Respondents were apprised of when they still maintained custody of Petitioner (albeit when he was in air). *Second*, Respondents act as though Petitioner’s *pro se* habeas petition need not be construed liberally. False. Petitioner’s habeas petition must be so construed—and there is no question that district courts have jurisdiction to adjudicate whether an alleged noncitizen is wrongfully incarcerated. No jurisdiction stripping statute deprives this Court from hearing a wrongful incarceration claim and, in any event, that

claim is saved by the Suspension Clause. *Third*, Respondents take for granted factual matters that remain in dispute. Because those matters cannot be challenged or resolved in Petitioner's absence, he should be returned to the United States. Removal cannot be an escape hatch for Respondents to avoid discovery concerning their violation of this Court's order, which unquestionably predated Petitioner's removal and of which they had notice when Petitioner was still in their custody.

I. The All Writs Act Empowers This Court to Order Respondents to Facilitate Petitioner's Return.

A. This Court Has Inherent and Statutory Authority to Enforce Its Orders.

The AWA allows federal courts to preserve the integrity of their jurisdiction to adjudicate claims before them. *See* 28 U.S.C. § 1651(a) (authorizing courts to "issue all writs necessary or appropriate in aid of their respective jurisdictions and agreeable to the usages and principles of law"). Indeed, the Supreme Court has "repeatedly recognized the power of a federal court to issue such commands under the [AWA] as may be necessary or appropriate to effectuate and prevent the frustration of orders it has previously issued in its exercise of jurisdiction otherwise obtained." *United States v. New York Tel. Co.*, 434 U.S. 159, 172 (1977). As established *infra*, this Court had jurisdiction over Petitioner's underlying petition and properly exercised it in issuing a TRO. As such, this Court has the "inherent and statutory" authority to enter such orders necessary to effectuate its already-ordered TRO. *Mississippi Valley Barge Line Co. v. United States*, 273 F. Supp. 1, 6 (E.D. Mo. 1967) (three-judge panel) ("It is well settled that the courts of the United States have the inherent and statutory (28 U.S.C. § 1651) power and authority to enter such orders as may be necessary to enforce and effectuate their lawful orders and judgments, and to prevent them from being thwarted and interfered with by force, guile, or otherwise."), *aff'd* 389 U.S. 579 (1968); *see also Henderson v. Off. of Thrift Supervision*, 135 F.3d 356, 360 (5th Cir. 1998) (quoting *Mississippi Valley*, 273 F. Supp. at 6).

At bar is a straightforward application of the AWA, which the Court may wield to preserve the status quo ante and “prevent the frustration” of a court order “previously issued.” *New York Tel. Co.*, 434 U.S. at 172 (holding that the AWA is a broad remedy that empowers a federal court to “avail itself of all auxiliary writs as aids in the performance of its duties, when the use of such historic aids is calculated in its sound judgment to achieve the ends of justice entrusted to it”). To be clear, this use of the AWA is distinguishable from cases where there was no court order in place prior to removal. *See, e.g., Alomaisi v. Decker*, 2021 WL 611047, at *9 (S.D.N.Y. Jan. 27, 2021) (refusing repatriation where there was no stay or judicial order precluding removal); *H.T. v. Warden*, 2020 WL 12656230, at *5 (M.D. Ga. Dec. 29, 2020) (refusing repatriation when petitioner was removed prior to any stay being ordered in his case).

Here, bringing Petitioner back would “achieve the ends of justice,” *New York Tel. Co.*, 434 U.S. at 172; because justice *right now* means that his claims may be adjudicated, regardless of whether they, in the end, fail to pass muster. *See Christmas v. Hooper*, 118 F.4th 724 (5th Cir. 2024) (agreeing with petitioner on the mailbox rule but holding his ultimate claims for relief fail). Because Petitioner was “in custody” when Respondents learned of this Court’s order (*i.e.*, when he was midflight to Laos, *see* Dkt. 23 at 3–4)¹, the Court can order Respondents to comply with its “previously issued” order. *New York Tel. Co.*, 434 U.S. at 172. Because Petitioner is “unable to effectively litigate his case from Laos,” Dkt. 4 at 2, Respondents should facilitate his return.

B. There Is No Dispute that the Petition Was Properly Served. Willful Blindness to a Court Order Is Not a Valid Excuse for Noncompliance.

Respondents do not dispute that Petitioner properly served his emergency petition and motion for a TRO. Rather, they assert that they “regret” that they did not know about the TRO

¹ *See* Omni Air Int’l 3747, FlightAware, <https://www.flightaware.com/live/flight/OAE3747/history/20251024/1530Z/KBWI/LROP> (last accessed Nov. 3, 2025).

until after Petitioner was removed from the United States. Dkt. 15 at 8. But that excuse misses the mark where, as here, a *pro se* petitioner fulfilled all service requirements that placed Respondents on notice of what could (and did) naturally follow—here, the *ex parte* issuance of a TRO. *See Houston v. Lack*, 487 U.S. 266, 271 (1988) (holding that an incarcerated *pro se* litigant satisfied service and notice requirements when he delivered notice of appeal to prison official for mailing, and explaining that whereas, “[o]ther litigants may choose to entrust their appeals to the vagaries of the mail and the clerk’s process for stamping incoming papers, [] only the *pro se* prisoner is forced to do so by his situation”); *Hooper*, 118 F.4th at 728 (holding that the *pro se* litigant’s letter, which had been deposited in the prisoner mailbox and addressed to the wrong court, was sufficient to construe a timely-filed notice of appeal). In the same vein that courts are not allowed to dismiss appeals for failing to arrive at the courthouse doors timely, so too are Respondents not permitted to feign ignorance that an *ex parte* TRO may issue in the face of an emergency habeas petition and motion for TRO, which they know full well had been filed and of which they were properly served.

It follows that Respondents may not avoid confronting a challenge to detention simply by turning a blind eye to a court docket they know to be in existence. That amounts to willful blindness and is not countenanced by the law. The doctrine of willful blindness has a “long history” in the criminal law, and due to “its wide acceptance in the Federal Judiciary,” the Supreme Court has extended its application to civil matters. *See Glob.-Tech Appliances, Inc. v. SEB S.A.*, 563 U.S. 754, 768 (2011); *see also Lewis v. Cain*, 2021 WL 1219988, at *38 (M.D. La. Mar. 31, 2021) (citing *Farmer v. Brennan*, 511 U.S. 825, 843 n.8 (1994) (prison official “would not escape liability if the evidence showed that he merely refused to verify underlying facts that he strongly suspected to be true, or *declined to confirm inferences of risk* that he strongly suspected to exist” (emphasis added)))); *Cleveland v. Gautreaux*, 198 F. Supp. 3d 717, 741 (M.D. La. 2016) (similar).

Here, Respondents have no excuse for failing to daily check the Court’s docket upon service of the petition and motion for a TRO. Whether they wanted to do that manually or simplify the process by entering a notice of appearance to ensure timely notice of the dockets progress is of no moment. Indeed, as Respondents’ filing shows, they were on notice of the matter and had the ability to independently check the Court’s docket. Dkt. 23 at 3–4. In fact, they did so when Petitioner was still in their custody, *see supra* n.1—and yet they did nothing to comply with this Court’s Order. It is no excuse to say that they did not know of this Court’s Order timely when they could have simply filed a notice of appearance in this case when the petition came to the desk of Respondents’ counsel—sometime after he properly served it on October 15, 2025. *See* Dkt. 3 at 8. But they did not file an appearance. Instead, they chose to manually check the docket because they knew an *ex parte* order could issue. If they had no such suspicion, there would have been no need to check the docket. These actions reflect willful blindness on the part of Respondents. *See Glob.-Tech*, 563 U.S. at 769 (“[A] willfully blind defendant is one who takes deliberate actions to avoid confirming a high probability of wrongdoing and who can almost be said to have actually known the critical facts.”).

Most importantly, Respondents could have easily, upon locating Petitioner in-flight, either turned the flight around or completed the flight to Laos and returned with Petitioner on that flight to ensure compliance with this Court’s Order.² Because that remedy was available to them in real-time, they cannot disclaim responsibility now and refuse to facilitate Petitioner’s return.

² Moreover, Respondents timeline as to what was done when (and therefore what could have been done when) remains in significant dispute. Although Respondents submitted a declaration claiming that Petitioner was “booked into the Alexandria Staging Facility in Alexandria, Louisiana at approximately 9:26 AM local time” on October 20, 2025, Dkt. 15-1 at ¶ 7, that is impossible given that Petitioner was at the Louisiana ICE Processing Center in Angola—over two hours away from Alexandria—receiving legal rights information at that time. *See* Ex. A, Declaration of Alyssa Simon. Respondents note that ICE is a large organization and neither party has identified individuals who have direct knowledge of the facts at issue. Dkt. 23 at 4. But that is precisely the problem—for that very reason, to resolve the factual matters in dispute, Petitioner’s presence in the United States is necessary.

C. Petitioner's Return Is Feasible for Respondents to Execute.

The requested remedy for Respondents' willful blindness is Petitioner's return to the United States. His return is not only feasible, but also is a remedy that has been ordered by courts across the country.³ The U.S. Government "can—and does—return wrongfully removed migrants as a matter of course." *Abrego Garcia v. Noem*,⁴ No. 25-1345, 2025 WL 1021113, at *4 (4th Cir. Apr. 7, 2025) (Thacker, J. concurring) (citing *Nken v. Holder*, 556 U.S. 418, 435 (2009)); see also *Abrego Garcia*, 348 F.R.D. 589, 592 n.1 (D. Md. 2025). Practically speaking, Respondents have the logistical tools at their ready disposal to facilitate Petitioner's return. The Staging Facility—where Petitioner was detained prior to his removal—is a hub for Respondents' removal operations, and directly connected to Alexandria International Airport.⁵ Indeed, public information reflects that the very flight used to remove Petitioner returned to Alexandria four days after its departure.⁶ Any return would merely require Respondents to facilitate Petitioner's travel back to the United States—which can even be as simple as placing Petitioner on a future return flight from Laos.⁷

³ See, e.g., *Singh v. Att'y Gen.*, No. 15-10136 (11th Cir. July 2, 2015) (instructing DHS to locate petitioner and advise him of his right "to be returned to the United States"); *Nunez-Vasquez v. Barr*, 965 F.3d 272, 286 (4th Cir. 2020); *Arce v. United States*, 899 F.3d 796, 799 (9th Cir. 2018); *Orabi v. Att'y Gen.*, 738 F.3d 535, 543 (3d Cir. 2014); *Samirah v. Holder*, 627 F.3d 652, 665 (7th Cir. 2010) (commanding the Attorney General "take whatever steps are necessary to enable the plaintiff to reenter the United States"); *Umba v. Garland*, No. 19-9513, 2021 WL 3414104, at *10 n.2 (10th Cir. Aug. 5, 2021); *Melgar-Salmeron v. Bondi*, No. 23-7792 (2d Cir. 2025); *Hamama v. Adducci*, No. 2:17-cv-11910 (E.D. Mich. Jan. 15, 2019), Dkt. 513.

⁴ While Respondents assert that "this case is not *Abrego Garcia*," Dkt. 23 at 11, both cases involve removals in violation of court orders: here, Petitioner was removed following this Court's Order enjoining his removal; in *Abrego Garcia*, Mr. Abrego Garcia was removed to El Salvador following an immigration judge's order prohibiting his removal to El Salvador.

⁵ Lauren Villagran, *This rural airport (with a jail on the tarmac) is Trump's deportation hub*, USA Today (July 26, 2025), <https://www.usatoday.com/story/news/nation/2025/07/26/alexandria-staging-facility-louisiana-trump-deportation-hub/85322642007>.

⁶ See Omni Air Int'l 3747, FlightAware, <https://www.flightaware.com/live/flight/OAE3747/history/20251024/1530Z/KBWI/LROP> (last accessed Nov. 3, 2025).

⁷ Flight tracking indicates at least one deportation flight per month to Laos for the past three months. See Human Rights First, *ICE Flight Monitor: September 2025 Monthly Report* 19 (Oct. 9, 2025), https://humanrightsfirst.org/wp-content/uploads/2025/10/US-Immigration-Enforcement-Flight-Report_Sep2025.pdf (tracking one deportation flight a month to Laos in August and September 2025).

The fact that Petitioner is currently detained in Laos does not prevent this Court from ordering Respondents to undertake any necessary steps to facilitate his return.⁸ *See Noem v. Abrego Garcia*, 145 S. Ct. 1017, 1018 (2025) (noting that the district court’s order “properly requires the Government to ‘facilitate’ Abrego Garcia’s release from custody in El Salvador and to ensure that his case is handled as it would have been had he not been improperly sent to El Salvador”). This case is nothing like *D.A. v. Noem*, where the court held that it did not have the power to grant the relief sought by petitioners, which went beyond straightforward return to the United States—as they sought a court order requiring U.S. government officials to notify the Ghanaian government not to remove Petitioners to countries of origin. No. 5-CV-3135 (TSC), 2025 WL 2646888, at *7 (D.D.C. Sept. 15, 2025). Respondents thus have no reason not to facilitate Petitioner’s return.

II. Substantive Factual Disputes Remain, Meriting Petitioner’s Return.

Petitioner’s return and additional discovery are warranted in this case. First, important factual disputes at issue in this case require Petitioner’s presence, participation, and testimony. By way of example, Petitioner’s whereabouts and the time at which he was taken to the Staging Facility on October 20, 2025 are in dispute. *See supra* n.2; *compare* Ex. A, with Dkt. 15-1 at ¶ 7. So too are Petitioner’s stated claims to counsel from a Laotian jail—made during extremely limited and non-confidential calls, scheduled outside of his or his counsel’s control—that he raised his citizenship claim on numerous occasions prior to filing his habeas petition. Dkt. 23 at 2 (noting that *pro so* Petitioner “has not alleged” that he raised his claim to citizenship prior to the filing of this habeas petition). All told, additional discovery is warranted as to Respondents’ violation of this Court’s order. While it is true that a habeas petitioner, “unlike the usual civil litigant in federal court, is not entitled to discovery as a matter of ordinary course,” *Bracy v. Gramley*, 520 U.S. 899,

⁸ The nature and extent of the steps Respondents would have to take to secure Petitioner’s return to the United States are unexplained in Respondents’ brief and present further factual questions that require clarification.

904 (1997), in *Hamdi v. Rumsfeld*, the Supreme Court explained that “[th]e simple outline of § 2241 makes clear that both Congress envisioned that habeas petitioners would have some opportunity to present and rebut facts and that courts in cases like this retain some ability to vary the ways in which they do so as mandated by due process,” 542 U.S. 507, 526 (2004).⁹ Indeed, “the court should not hesitate to allow discovery, where it will help illuminate the issues underlying the applicant’s claim”—here wrongful removal despite a court order being in place. *Gaitan-Campanioni v. Thornburgh*, 777 F. Supp. 1355, 1356 (E.D. Tex. 1991).

In his underlying habeas petition, Petitioner challenges the lawfulness of his detention, over which this Court has jurisdiction. *See* Dkt. 2; *see infra* Section III. To fully litigate that claim and enforce the related TRO, he needs to be present in the United States. Dkt. 4 at 4. Significantly, the only evidence thus far produced in relation to the lawfulness of Petitioner’s detention is a declaration from Brian Acuna, Dkt. 15-1, which neither addresses the substance of Petitioner’s claim nor accurately describes the course of his removal from the United States.¹⁰ *Compare* Dkt. 15-1, *with* Ex. A (discussed *supra* at n.2). Of course, as Respondents assert, ICE is a large agency. Dkt. 23 at 4. Petitioner agrees, and this is all the more reason to return Petitioner, so he can testify to his own experiences, and to conduct limited discovery, so all parties may understand what exactly Respondents knew, when exactly Respondents knew it, and how exactly Petitioner ended up in a detention center in Laos despite a federal court order precluding his removal. Return and limited discovery could clear up the factual issues underlying Petitioner’s wrongful handover to

⁹ 28 U.S.C. § 2246 states in full that “[i]f affidavits are admitted any party shall have the right to propound written interrogatories to the affiants.” *See also Harris v. Nelson*, 394 U.S. 286, 290 (1969) (“[W]here specific allegations before the court show reason to believe that the petitioner may, if the facts are fully developed, be able to demonstrate that he is . . . entitled to relief, it is the duty of the courts to provide the necessary facilities and procedures for an adequate inquiry.”); *Gibbs v. Johnson*, 154 F.3d 253, 258 (5th Cir. 1998) (same); *Murphy v. Davis*, 901 F.3d 578, 590 (5th Cir. 2018) (same).

¹⁰ Although counsel for Petitioner promptly responded to counsel for Respondents’ requests for information, and sent over inquiries of their own on October 31, 2025, counsel for Petitioner has yet to receive a response.

Laotian officials after Respondents were placed on notice of this Court’s Order while he was still in their custody. *See Gaitan-Campanioni*, 777 F. Supp. at 1356 (granting discovery request where “it will help illuminate the issues underlying the applicant’s claim”).

III. This Court Had and Retains Jurisdiction Over the Petition for Habeas Corpus.

It is well-settled that a petition filed by a *pro se* litigant “must be held to ‘less stringent standards than formal pleadings drafted by lawyers’ and can only be dismissed for failure to state a claim if it appears ‘beyond doubt that the plaintiff can prove no set of facts in support of his claim which would entitle him to relief.’” *Estelle v. Gamble*, 429 U.S. 97, 106 (1976); *see also Erickson v. Pardus*, 551 U.S. 89, 94 (2007); *Cf.* Fed. Rule Civ. Proc. 8(f) (“All pleadings shall be so construed as to do substantial justice”). Thus, because the Court may read *pro se* claims broadly, the Court may properly construe Petitioner’s *pro se* pleading as a challenge to his wrongful detention—not the execution of his removal order, and not as a request to declare that he is a United States citizen. *See* Dkt. 4 at 3 (Petitioner “presents serious questions regarding the *legality* of his detention and imminent deportation” (emphasis added)).

In opposition, Respondents argue that this Court lacks jurisdiction under 8 U.S.C. § 1252(a)(5), 1252(b)(9), and 1252(g). Dkt. 23 at 6–7. In short, per Respondents, no analysis of whether Petitioner’s detention was unlawful can be undertaken by this Court because, contrary to the Court’s own determination, Dkt. 4, this Court does not have jurisdiction over Petitioner’s habeas corpus petition. Not so. At bottom, Respondents incorrectly point this Court to case law suggesting an overly broad reading of Section 1252.¹¹ But “as all-encompassing as its provisions

¹¹ Respondents’ case law is inapposite to the matter at bar and does not address challenges to unlawful detention, which are properly brought in habeas. Dkt. 23 at 8. Respondents cite to *Duarte v. Mayorkas*, 27 F.4th 1044, 1052 (5th Cir. 2022), concerning USCIS’ administrative closures of applications of permanent resident status; *Cardoso v. Reno*, 216 F.3d 512, 516 (5th Cir. 2000), also concerning adjustments to administrative actions (Dkt. 23 at 7); *Martinez v. Napolitano*, 704 F.3d 620, 622 (9th Cir. 2012), an Administrative Procedure Act challenge to the treatment of an asylum application (Dkt. 23 at 7); and *Estrada v. Holder*, 604 F.3d 402, 408 (7th Cir. 2010), concerning USCIS administrative action. Respondents largely characterize Petitioner’s claims as administrative,

may seem, [that] statute has its limitations.” *Lopez Santos v. Noem*, No. 3:25-CV-01193, 2025 WL 2642278, at *2 (W.D. La. Sept. 11, 2025). The Supreme Court has held that Sections 1252(a)(5) and (b)(9) do *not* preclude petitions for habeas corpus challenging unlawful detention. *See Jennings v. Rodriguez*, 583 U.S. 281, 294–95 (2018) (rejecting an expansive reading of Sections 1252(a)(5) and (b)(9) and noting that “arising from” is not an “uncritical literalism” that leads to results “no sensible person could have intended”); *see also Gutierrez v. Balthazar*, No. 25-CV-2720-RMR, 2025 WL 2962908, at *3 (D. Colo. Oct. 17, 2025) (applying *Jennings*); *Dep’t of Homeland Sec. v. Regents of the Univ. of California* 592 U.S. 1, 19 (2020) (Section 1252(b)(9) is not a jurisdictional bar to those who “are not asking for review of an order of removal, the decision to seek removal, or the process by which removability will be determined”). And section 1252(g) strips jurisdiction for a “narrow” class of noncitizen challenges to “discrete actions” of the Attorney General and does not touch wrongful detention claims. *Reno v. Am.-Arab Anti-Discrimination Comm.*, 525 U.S. 471, 482 (1999) (“*AADC*”) (it would be “implausible that the mention of three discrete events along the road to deportation [serve] as a shorthand way of referring to all claims arising from deportation proceedings.”).

Simply put, because this Court has jurisdiction over Petitioner’s narrow claim challenging his wrongful detention and issued its order when Petitioner was still in Respondent’s custody, the Court has authority under the AWA to effectuate the Order it issued. *Henderson*, 135 F.3d at 360.

CONCLUSION

Petitioner asks this Court to grant his motion to enforce and compel his return.

citing to *Iasu v. Smith*, 511 F.3d 881, 888 (9th Cir. 2007) for the statute’s restrictions on challenges to orders of removal; to *H.T. v. Warden, Stewart Det. Ctr.*, 2020 WL 12656230, at *4 (M.D. Ga. Dec. 29, 2020), *report and recommendation adopted*, 2021 WL 5444776 (M.D. Ga. Feb. 23, 2021), a decision rejecting in large part untimely and non-habeas relief; and *Alomaisi v. Decker*, 2021 WL 611047, at *9 (S.D.N.Y. Jan. 27, 2021), *report and recommendation adopted sub nom. Alomaisi v. Mayorkas*, 2021 WL 3774117 (S.D.N.Y. Aug. 25, 2021), a petition filed *after removal*; *Zarefard v. Noem*, 2025 WL 1805864, at *1 (W.D. La. June 30, 2025), interpreting “executing removal orders” to preclude stays of orders of removal.

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Respectfully submitted,

Sarah E. Decker*
ROBERT F. KENNEDY HUMAN
RIGHTS
1300 19th Street NW, Suite 750
Washington, DC 20036
Tel: (908) 967-3245
decker@rfkhumanrights.org

Sarah T. Gillman*
ROBERT F. KENNEDY HUMAN
RIGHTS
88 Pine Street, 8th Floor, Suite 801
New York, NY 10005
Tel: (646) 289-5593
gillman@rfkhumanrights.org

Stephanie M. Alvarez-Jones*†
Bridget Pranzatelli*
NATIONAL IMMIGRATION PROJECT
OF THE NATIONAL LAWYERS GUILD
(National Immigration Project)
1763 Columbia Road NW
Ste. 175 #896645
Washington, DC 20009
T: (202) 470-2082
F: (617) 227-5495
stephanie@nipnlg.org
bridget@nipnlg.org

/s/Charles Andrew Perry
Charles Andrew Perry
LA Bar No. 40906
Nora Ahmed*
NY Bar No. 5092374
ACLU FOUNDATION OF LOUISIANA
1340 Poydras St., Ste. 2160
New Orleans, La 70112
Tel: (504) 522-0628
aperry@laaclu.org
nahmed@laaclu.org

Attorneys for Petitioner

**Admitted pro hac vice*

*† Not admitted in DC; working remotely from and
admitted in Georgia and New Jersey only*

CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2025, I filed the foregoing Reply and supporting documents with the Clerk of Court using the CM/ECF system which will provide notice to all counsel of record.

/s/Charles Andrew Perry