

1 James D. Jenkins
2 P.O. Box 6373
3 Richmond, VA 23230
4 (804) 873-8528
5 jjenkins@valancourtbooks.com

6 Laura Belous, 028132
7 Florence Immigrant & Refugee Rights Project
8 P.O. Box 86299
9 Tucson, AZ 85754
10 (520) 934-7257
11 lbelous@firrp.org

12 *Attorneys for Petitioner*

13 **IN THE UNITED STATES DISTRICT COURT**
14 **DISTRICT OF ARIZONA**

15 Heidi Lorena Gomez Rodriguez,

16 Petitioner,

17 v.

18 Fred Figueroa, *et al.*,

19 Respondents.

20 **Case No. 25-cv-3879-KML-MTM**

21 **PETITIONER'S REPLY AND**
22 **PROPOSED ORDER**

23 In light of Respondents' response (Dkt. 8), Petitioner respectfully requests that the
24 Court grant the relief sought in her Petition (Dkt. 1). A proposed order is filed herewith.

25 Dated: October 28, 2025

26 Respectfully submitted,

27 /s/ James D. Jenkins
28 James D. Jenkins (WA #63234)
P.O. Box 6373
Richmond, VA 23230
Tel.: (804) 873-8528
jjenkins@valancourtbooks.com

