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11 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA (Las Vegas)**

13  
14 **L.R.**

*Petitioner,*

Case No.: 2:25-cv-02019-RFB-BNW

v.

17 **KRISTI NOEM, U.S. DEPARTMENT OF**  
**HOMELAND SECURITY; PAMELA J.**  
 18 **BONDI, U.S. DEPARTMENT OF**  
**JUSTICE; TODD LYONS, JASON**  
 19 **KNIGHT, U.S. IMMIGRATION AND**  
**CUSTOMS ENFORCEMENT; JOHN**  
 20 **MATTOS,**

**REPLY IN SUPPORT**  
**OF MOTION FOR TEMPORARY**  
**RESTRAINING ORDER**

21 *Respondents.*

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1 **INTRODUCTION**

2 On November 22, 2025, Petitioner filed a Motion for Temporary Restraining Order, ECF  
3 No. 11, detailing an alarming incident during which Respondents came dangerously close to  
4 illegally removing Petitioner from the United States. In addition to nearly exposing Petitioner to  
5 a high risk of torture in a foreign country, this near miss inflicted an additional injury: Arbitrary  
6 imposition of fear, given the danger that deportation poses to him.

7 On November 23, 2025, the Court enjoined Respondents from removing Petitioner from  
8 the United States District of Nevada. ECF No. 12. The Court further ordered that Respondents  
9 are not to allow Petitioner to be removed or even transported for any purpose from Nevada  
10 Southern Detention Center (“NSDC”) without a written order from the Court.

11 Petitioner files this Reply in Support of his Motion for Temporary Restraining Order in  
12 response to Respondents’ Response, ECF No. 18, filed on December 12, 2025. In their filing,  
13 ECF No. 18, Respondents offer no explanation for why the nearly disastrous deportation on  
14 November 20 came so close to happening other than to say it was “inadvertent.” This lack of  
15 explanation is an indication that the danger remains and safeguards from this Court remain  
16 necessary.

17 **ARGUMENT**

18 Respondents largely acknowledge the events of November 20, 2025, as described in  
19 Petitioner’s Motion for TRO, occurred. Respondents frame their actions to Petitioner as  
20 “inadvertent processing,” but regardless of how the conduct is characterized, the Court should  
21 examine its practical effect. *See* ECF No. 18, at 2. In acknowledging this “inadvertent  
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1 processing,” Respondents concede that for several hours Petitioner was processed for removal  
2 from the United States until the error was caught.

3 From the available evidence, it may have taken Respondents close to half a day to catch  
4 their mistake. L.R. reports that he was woken up at or around 2:00 in the morning to be  
5 transported. *See* ECF No. 11, at 3; *see also* ECF No. 11-1, at 7-8. Respondents do not appear to  
6 dispute that claim, with Randy Flores, Supervisory Detention Deportation Officer with  
7 Immigration and Customs Enforcement, explaining that “[i]ndividuals detained at the NSDC and  
8 scheduled for removal from the U.S. are generally subject to early morning processing due to  
9 time constraints.” *See* ECF No. 18-1, at iii. Based on Mr. Flores’s Declaration, L.R. must have  
10 been initially processed at the NSDC several hours before being transported by bus from  
11 Pahrump to Las Vegas. Additional processing by ERO occurs at the Las Vegas Federal Justice  
12 Tower, and it is unclear how long into that processing it was when officers determined that L.R.  
13 should not be removed from the U.S.

14 Respondents inexplicably argue Mr. Flores’s Declaration “makes clear that the version of  
15 events are distinctively different and no staging of deportation took place,” ECF No. 18 at 4.  
16 Respondents fail to explain what is distinctively different in the accounts. On any fair reading,  
17 Mr. Flores has confirmed Petitioner’s account in general out lines and in some key details.

18 Respondents fail to answer a number of questions that raise grave concerns. First,  
19 Respondents do not explain how or why L.R. was mistaken as an individual scheduled for  
20 removal in the first place. Second, Respondents fail to explain how, in those multiple hours of  
21 processing time, this error was not caught earlier. This delay in catching the error led L.R. to  
22 believe for several hours that he would be deported from the United States that day. Third,  
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