

CERTIFICATE OF COUNSEL

Pursuant to Local Rule 65.1, I certify that on December 11, 2025, I spoke with counsel for the Respondent, Erika Kelley, who confirmed that Mr. Romeru was transferred to Port Isabel to stage him for removal and that DHS intends to remove him, though she could not confirm the timing. Undersigned counsel informed Ms. Kelley of his intention to file the instant motion, the relief sought, and the legal basis for the motion, prior to filing.

A copy of this motion and the memorandum in support will be provided to counsel for Respondent via the Court's CM/ECF system.

Dated: December 11, 2025

Respectfully submitted,

/s/ Kevin Hirst
KEVIN HIRST