

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA
DALLAS DIVISION

MARTIN SEGUNDO RIOS FERREIRA,
Petitioner,

v.

KRISTI NOEM,
Secretary of Homeland Security, et al.,
Respondents.

Civil No. 1:25-cv-00218-H

**RESPONSE OF PETITIONER'S COUNSEL TO ORDER
TO SHOW GROUNDS FOR ADMISSION**

TO THE HONORABLE JUDGE HENDRIX:

COMES NOW the undersigned John M. Bray, as Counsel for Petitioner, Martin Segundo Rios Ferreira ("Mr. Rios"), and respectfully submits this response to the Court's Order to Show Grounds for Admission entered on November 12, 2025, ECF No. 13, and states as follows:

I. Counsel's Admission Status.

1. I am, and have been for more than ten years, a duly admitted member in good standing of the Bar of the United States District Court for the Northern District of Texas.

2. The admission of the undersigned Counsel to the Northern District of Texas was granted approximately two years after admission to the State Bar of Texas in May 2012, and the undersigned Counsel has remained continuously active and in good standing since that time.

3. As Proof of Good Standing, the undersigned submits a printout from the Northern District of Texas CM/ECF Bar Admission portal, dated November 12, 2025, confirming

that the undersigned Counsel's Bar Status is "Admitted/In Good Standing" under the jurisdiction "Texas Northern." *See* Attachment 1.

II. Clarification Regarding CM/ECF Registration.

4. The undersigned Counsel's CM/ECF credentials for the Northern District of Texas remain active, and the undersigned Counsel has continued to e-file pleadings in various divisions of this Court. Although the undersigned Counsel practices primarily in the Dallas Division of this Court, the undersigned Counsel would respectfully highlight to the Court that the undersigned also has cases pending before your Honor in the San Angelo Division.

5. It appears that the notice in this matter may have been triggered by a clerical mismatch between the CM/ECF user account profile and the attorney information associated with the present case's initial transfer docket entry, rather than any lapse in admission or standing. Nevertheless, the undersigned Counsel would respectfully request that the Clerk of the Court simply review the Court's records of admission from the Dallas Division, rather than requiring the undersigned Counsel to incur a \$21 fee to purchase a Certificate of Good Standing.

III. Request for Acknowledgment of Standing.

6. Based on the attached proof of good standing and the undersigned Counsel's longstanding admission to this Court, Petitioner respectfully requests that the Court deem the Order to Show Grounds satisfied and acknowledge Counsel's eligibility to practice before this Court in this matter without the need for a separate *pro hac vice* application.

IV. Conclusion.

For the foregoing reasons, the undersigned Counsel for Petitioner respectfully requests that this Honorable Court take the following actions:

1. **Take judicial notice** of counsel's current admission and good standing in the Northern District of Texas;
2. **Discharge the Order to Show Grounds for Admission** as satisfied; and
3. **Permit counsel to continue representation** of Petitioner in this case without further administrative action or hindrance.

DATE: November 12, 2025.

Respectfully submitted,

THE LAW OFFICE OF JOHN M. BRAY, PLLC
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By: /s/ John M. Bray

John M. Bray
Texas Bar No. 24081360
ATTORNEY FOR PETITIONER

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that on this day, I served a true and correct copy of the above and foregoing *Petitioner's Response to Order to Show Grounds for Admission*, as well as any and all attachments thereto, on Counsel for Respondents by serving the same via email to Ms. Ann Cruce-Haag, Assistant U.S. Attorney for the Northern District of Texas via Ann.Haag@usdoj.gov and/or by filing the same using the CM/ECF system.

/s/ John M. Bray
John M. Bray
Attorney for Petitioner

DATE: November 12, 2025.