

619 River Dr, Suite 340, Elmwood Park, NJ 07407
(201) 508-0808
www.ogplawfirm.com
enes@ogplawfirm.com

November 1, 2025

VIA ECF

Honorable Rebecca Rutherford
United States District Court
Northern District of Texas
1100 Commerce Street, Room 1376W
Dallas, Texas 75242

Re: *Dechang Yang v. Thomas Bergami, et al.*
Docket No.: 3:25-cv-02877-B (BT)

Dear Judge Rutherford:

The parties in this matter respectfully submit this joint report pursuant to the Court's October 27, 2025 Order. The Order directed the parties to submit a joint report that includes "(1) an indication as to whether the parties object to consolidation of the issues in this action; (2) an update regarding the status of Petitioner's detention; and (3) any other matters relevant to the status or disposition of the case." The parties jointly submit the following:

1. The parties have conferred and neither party objects to the consolidation of the issues in this action.
2. Petitioner remains detained at Bluebonnet Detention Center. Petitioner contends that he is detained under 8 U.S.C. 1226(a). Respondents contend that Petitioner is detained under 8 U.S.C. 1225(b)(2).
3. The parties have conferred and agreed to a briefing schedule in this matter. Respondents' agree to submit their response to the Petition for Writ of Habeas Corpus and Motion for Temporary Restraining Order and Preliminary Injunction by November 10, 2025. Petitioner has agreed to file a reply to the Respondents' response by November 17, 2025. The parties kindly request that the Court adopt this briefing schedule.

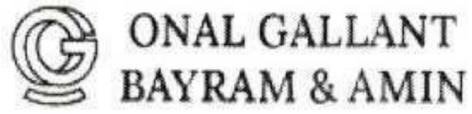
The parties thank the Court for its consideration of this matter.

ONAL GALLANT
BAYRAM & AMIN

NANCY LARSON
United States Attorney

By: /s/ Enes Hajdarpasic
ENES HAJDARPASIC
Attorney for Petitioner
(Pro Hac Vice Admitted)

By: /s/ Ann Cruce-Haag
ANN CRUCE-HAAG
Assistant U.S. Attorney
Attorney for Respondents



619 River Dr, Suite 340, Elmwood Park, NJ 07407
(201) 508-0808
www.ogplawfirm.com
enes@ogplawfirm.com

GH Law Firm, P.C.

By: /s/ Muhammed Gulen
MUHAMMED GULEN
Attorney for Petitioner
(Local Counsel)