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BY ECF

The Honorable Jamel K. Semper, U.S.D.J.
U.S. District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Polat v. Pamela Bondi, et al., No. 25-16893
Supplemental Authority

Dear Judge Semper:

We write to inform this Honorable Court that Judge O’Hearn issued an opinion yesterday in *Rivas Rodriguez v. Rokosky*, No. 25-cv-17419 (CPO)(D.N.J. Dec. 3, 2025) (attached). *Rivas Rodriguez’s* factual and legal arguments are the same as the one in this matter. Like Petitioner, Rivas Rodriguez entered the United States without inspection, was encountered by CBP, was issued an Expedited Order of Removal, and then paroled from custody. Like Petitioner, Rivas Rodriguez applied for asylum, which USCIS dismissed due to his Expedited Order of Removal, and was given a Credible Fear Interview at the Bethpage, New York Asylum Office, which he passed. Additionally, like Petitioner, Rivas Rodriguez was then placed into Removal Proceedings and subsequently detained and subjected to mandatory detention.

Judge O’Hearn rejected the same arguments made by Respondents in this matter. Judge O’Hearn ordered Rivas Rodriguez’s immediate release.

Since our last letter of November 18, 2025, the Petitioner has been moved once again from one detention facility to another within Arizona. He is currently detained at the Central Arizona Florence Correctional Facility. He has yet to see an immigration judge.

Respectfully submitted
/s/Matthew J. Archambeault
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Attorney for Petitioner

Cc: Counsel of Record (by ECF)