

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SLAWOMIR JERZY TKACZYK,)	
)	
Petitioner,)	
)	
v.)	No. 25 C 13185
)	
KRISTI NOEM, Secretary of Homeland)	Judge Seeger
Security, <i>et al.</i> ,)	
)	
Respondents.)	

**RESPONDENTS' MOTION TO SUBMIT SUPPLEMENTAL
AUTHORITY IN FURTHER SUPPORT OF THEIR RESPONSE**

Respondents, through their attorney, Andrew S. Boutros, United States Attorney for the Northern District of Illinois, request leave to submit as supplemental authority the following District Court decision—issued after respondents filed their memorandum in support of their return: *Mejia Olalde v. Noem*, No. 25-cv-168, Dkt. 26 (E.D. Mo. Nov. 10, 2025). That decision is attached hereto as Respondents' Exhibit 3, and is pertinent to the pending habeas petition because it deals with similar issues of statutory interpretation regarding 8 U.S.C. § 1225(b)(2) and 8 U.S.C. § 1226(a). Respondents thus offer this persuasive authority in further support of their return to petitioner's habeas petition.

Respondents' counsel contacted petitioner's counsel as to whether the petitioner would consent to apprising this court of the opinion in *Mejia Olalde*. In response, petitioner's counsel declined to consent, insisting that a decision from a district court in Missouri was of no moment, and that courts in this district are "pretty clear on the legal argument." With respect, respondents disagree because "[w]hat governs this case is the text of the statute, not what other district courts have concluded." *Mejia Olalde*, slip op. at 2.

WHEREFORE, respondents respectfully request that this court grant their motion for leave to file and cite supplemental authority in support of their return to the pending habeas petition.

Respectfully submitted,

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