

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

LEONEL RAMIREZ GUZMAN,

PETITIONER,

v.

KRISTI NOEM, et al.,

RESPONDENTS.

Civil Case No. 3:25-cv-2932-E (BT)

**PETITIONER'S UNOPPOSED MOTION FOR LEAVE TO FILE AMENDED
DOCUMENTS**

Petitioner, Leonel Ramirez Guzman, by and through undersigned counsel, files this motion asking for this Court's leave to file amended documents in this case. On October 29, 2025, Petitioner filed a habeas petition and corresponding emergency TRO asking this Court to release him from the custody of U.S. Immigration and Customs Enforcement ("ICE"). This Court has yet to rule on this case or set a date for the government to show cause by.

The purpose of amended filings is straightforward: As Petitioner's counsel has been litigating these cases across districts and states, it has become apparent that there are several aspects of the INA which make the underlying issues in these cases easier to understand. The amended filings do not assert new legal issues or facts. Rather, they provide additional context coupled by supporting authority that will facilitate in the adjudication of the issues presented.

Specifically, Petitioner is requesting to file an amended motion for a Temporary Restraining Order and/or a Preliminary Injunction and an Amended Habeas Petition with an Appendix in Support. These documents would amend the previous filings on this case's docket filed October 29, 2025, ECF 1 & 2.

Significantly the government does not oppose this motion. Accordingly, if this request is granted, it will not prejudice either party. Furthermore, this request is being made for good cause and with the intent to facilitate a quicker resolution of this matter.

For the above stated reasons, Mr. Ramirez Guzman asks this Court permission for leave to file amended documents in his case.

RESPECTFULLY SUBMITTED,

/s/ Dan Gividen

Dan Gividen

Texas State Bar No. 24075434

18208 Preston Rd., Ste. D9-284

Dallas, TX 75252

972-256-8641

Dan@GividenLaw.com

Certificate of Conference

I hereby certify that I spoke with AUSA Ann Cruce-Haag, and she does not oppose this motion.

/s/ Dan Gividen

DAN GIVIDEN

Attorney for Petitioner