

IN THE UNITED STATES DISTRICT COURT
FOR THE 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)

JOINT STATUS REPORT

COME NOW Petitioner Leonel Ramirez Guzman ("Petitioner") and Respondents Kristi Noem, et al. ("the government"), by and through their respective counsel, and file this Joint Status Report in accordance with the Court's Order of November 4, 2025 (ECF No. 6), and state as follows:

1. Consolidation of Issues:

Joint Response: The Parties do not object. The parties have been litigating the issues set forth in the habeas petition and Motion for TRO or Preliminary Injunction in this case and every other similar case as though they are one and the same. Therefore, the parties have no objection to the issues being consolidated in this case or any other similar habeas cases undersigned counsels appear in.

Petitioner's Additional Response: To the extent this question is meant to ask whether there is an objection to consolidating consideration of the TRO and Preliminary Injunction, it is Petitioner's position that the TRO has, for all intents and purposes, been constructively denied already. A TRO is issued without a response from the opposing party and is meant to immediately restore the status quo while the issues presented are further considered after the government files a response. Here, the status quo was Mr. Guzman Ramirez being on the non-detained removal proceeding docket.

2. An update regarding the status of Petitioner's detention:

Joint Response: Nothing about his detention status has changed. He continues to be detained in ICE custody and, absent an order from this Court, the government will not release him while his case § 1229a proceedings are still pending.

3. **Any other matters relevant to the status or disposition of the case:**

Joint Response: Unopposed motions for leave to file an amended habeas petition and TRO/Motion for Preliminary injunction are being filed on the same date as this joint status report.

Petitioner's Additional Responses:¹

A. If Judicial Efficiency is an Aim, a Hearing is the Best Means for to Accomplish it. It is Mr. Ramirez Guzman's position that a hearing on his motions set immediately would be of extraordinary benefit to everyone. In making this statement, undersigned counsel is fully cognizant of the informal/nonbinding belief/rule in the Northern District of Texas that hearings on TROs/injunctions are not necessary or helpful. This is not lip service. Rather, this was among the things conveyed week one of clerking for the Honorable Jorge A. Solis. But like every rule there is an exception to this one. One of the rare exceptions in 2009 was a case involving the Telecommunications Act of 1996—a complex statutory and regulatory scheme with terms, phrases, and procedures. The utility of a hearing in that case was in assisting with understanding the relevant aspects of the statutory and regulatory scheme.

The same exception applies with equal, if not greater, force here. “The complex provisions of the INA have provoked comparisons to a ‘morass,’² a “Gordian knot,”³ and ‘King Minos's labyrinth in ancient Crete.’”⁴ These comparisons are well-deserved. Without any background or experience with immigration law it is easy to get lost in the INA's labyrinth of statutes and terms. Worse, the INA has a unique way of making it difficult for non-practitioners—no matter how brilliant—to realize that an interpretation they

¹ To be clear, Petitioner's counsel did not run any of the things listed below by government counsel before filing this joint status report. Government counsel and undersigned agreed only on those things included in the joint responses and that Petitioner's counsel would add the other things specifically denoting them to be his position and not the government's.

² *Torres v. Barr*, 976 F.3d 918, 923 (9th Cir. 2020) (quoting *Lacsina Pangilinan v. Holder*, 568 F.3d 708, 709 (9th Cir. 2009) (quoting *Agyeman v. I.N.S.*, 296 F.3d 871, 877 (9th Cir. 2002))

³ *Id.* (quoting *Aguilar v. U.S. Immig. & Customs Enf't*, 510 F.3d 1, 6 (1st Cir. 2007)).

⁴ *Id.* (quoting *Lok v. I.N.S.*, 548 F.2d 37, 38 (2d Cir. 1977)).

are confident is right—is actually incorrect. A hearing would facilitate with understanding the applicable statutory provisions, their meaning, and the way they work in practice.

- B. The Utility of a TRO: A TRO is a particularly helpful procedural tool here, and in similar cases, where someone has presented a strong case that they are being unlawfully detained in civil detention (i.e. are not accused of a crime), were already released by ICE pursuant to 8 U.S.C. § 1226, were already in removal proceedings on the non-detained docket, and the only reason Mr. Ramirez Guzman is in ICE custody now is because every alien who reports to the Dallas ICE-ERO Field Office who is already in proceedings, could be placed in proceedings, or have a final order of removal, is being arrested and detained. The reason for this practice: (1) it is the only way they can meet the arrest quotas placed on them by headquarters,⁵ and (2) it forces Mr. Ramirez Guzman and similarly situated noncitizens to decide whether a 50/50 chance at being granted one of the statutory forms of relief Congress proscribed by the INA is worth being detained in ICE custody for at least 2-3 months with no liberty and no means of supporting their families—which here includes 5 children and wife.⁶ Point is, a TRO preserves the status quo by preventing the unlawful loss of liberty to Mr. Ramirez Guzman. Meanwhile, the government will have lost nothing and no one would be harmed.
- C. Petitioner's request for urgent consideration and an order requiring his release are not novel—both of these things are happening in hundreds of cases every day. The fact that hundreds of similar habeas cases are being filed throughout country everyday is well-known at this point. Petitioner is simply asking that this case be treated in the urgent manner they are being treated elsewhere. For example, Petitioner's counsel filed one such case yesterday (11/18) in the Western District of Texas. The same day it was filed, the court there set it for a hearing to take place tomorrow (11/20).⁷ That hearing, will not be taking place because the petitioner in that case was released by ICE today.⁸ The petitioner in another case filed 1-day before this case was filed was also

⁵ If the Court has any doubts about this statement, it could resolve those doubts by setting a hearing and requiring the government to call the Dallas-ICE Field Office Director as a witness. Petitioner is confident that sworn testimony from such an ICE official will confirm this statement. Petitioner is also confident that testimony from such an official would likely demonstrate the second statement about the policy is also accurate.

⁶ To be clear, § 1229a removal proceedings t

⁷ *Vaca Gomez v. Noem, et. al.*, 3:25-cv-0560-DB, ECF No. 6 (El Paso- WDTX Nov. 18, 2025).

⁸ *Vaca Gomez v. Noem, et. al.*, 3:25-cv-0560-DB, ECF No. 7 (El Paso- WDTX Nov. 19, 2025).

released today.⁹ The order for release in that case came after both parties fully briefed the issues. Another case filed in NDTX 1-day before this one resulted in U.S. Magistrate Judge Horan issuing findings recommending release of the petitioner in that case last week.¹⁰ Petitioner is cognizant that each court is independent and has full discretion over its docket. These cases are being raised simply as a means of demonstrating that Petitioner is not asking for anything unusual. To the contrary, Petitioner's counsel is simply asking that this case and the issues presented by it be treated in the same way the overwhelming majority of these cases are being treated.

RESPECTFULLY SUBMITTED,

/s/ Ann Cruce-Haag

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⁹ *Acea Martinez v. Noem, et. al.*, 5:25-cv-01390-XR, ECF No. 9 (San Antonio- WDTX Nov. 18, 2025).

¹⁰ *Flores Perez v. Noem, et. al.*, 3:25-cv-02960-K-BN, ECF No. 14 (Dallas- NDTX Nov. 14, 2025).