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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

M-J-M-A-,

Case No.: 6:25-cv-02011-MTK

Petitioner,

v.

**RESPONDENTS' RESPONSE TO
PETITIONER'S MOTION TO
COMPEL DISCOVERY**

**LAURA HERMOSILLO; TODD
LYONS; U.S. IMMIGRATION AND
CUSTOMS ENFORCEMENT;
KRISTI NOEM; U.S. DEPARTMENT
OF HOMELAND SECURITY;
PAMELA BONDI,**

Respondents.

Respondents, through counsel, submit this Response to Petitioner's Motion to Compel Discovery. ECF 35.

DISCOVERY & DISPUTE BACKGROUND

On November 1, 2025, Petitioner served Respondents with Petitioner's First Request for Production. On November 15, 2025, Respondents provided Petitioner with Respondents' Response to Petitioner's First Request for Production and a copy of Petitioner's A-file with redactions for law enforcement system identification numbers and what was believed to be a printout from a Customs and Border Patrol ("CBP") database.

On November 17, 2025, Petitioner's counsel conferred with Respondents' counsel regarding the instant motion to compel. On November 18, 2025, Petitioner filed the instant motion to compel. Petitioner's motion to compel clarifies the documents she is seeking. *See* ECF 35 at 8. On November 21, 2025, the Court ordered Respondents to respond to Petitioner's motion to compel by 5 p.m. on November 24, 2025.

CURRENT DISCOVERY STATUS

On November 21, 2025, Respondents produced a copy of Petitioner's A-file, which unredacted the page Respondents previously asserted they could not release because it was a printout of a CBP database.¹ Redactions regarding identification numbers pursuant to law enforcement databases remain.

¹ On November 20, 2025, Petitioner's counsel contacted Respondents' counsel for an update regarding discovery. That same day, Respondents' counsel replied to Petitioner's counsel's email and sent Petitioner's counsel the A-file with some

ARGUMENT

In response to Petitioner's motion to compel, Immigration and Customs Enforcement ("ICE") has produced or will produce its documents responsive to Petitioner's RFPs as clarified by Petitioner's motion to compel to the extent those documents exist. ICE will produce documents after the entry of a protective order.

Although CBP is not a proper respondent in this litigation, *see* ECF 25 n.1, and without waiving Respondents' objections as set forth in Respondents' Response to Petitioner's First Request for Production, additional materials from CBP will be produced after the entry of a protective order.

Respectfully submitted this 24th day of November, 2025.

SCOTT E. BRADFORD
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/s/ Ariana N. Garousi
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redactions removed. However, the size of the file rendered Respondents' counsel's email undelivered, which Respondents' counsel did not realize until November 21, 2025. Respondents' counsel remedied her mistake on November 21, 2025.