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7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**

9 VICTOR KALID JACOBO RAMIREZ; EDGAR
 10 MICHEL GUEVARA ALCANTAR; on behalf of
 themselves and others similarly situated, et al.,

Case No.: 2:25-cv-02136

11 Plaintiffs-Petitioners,

JOINT STATUS REPORT

12 vs.

13 KRISTI NOEM, Secretary, U.S. Department of
 14 Homeland Security, in her official capacity; U.S.
 DEPARTMENT OF HOMELAND SECURITY;
 15 PAMELA J BONDI, Attorney General of the
 United States, in her official capacity; TODD
 16 LYONS, Acting Director for U.S. Immigration and
 Customs Enforcement, in his official capacity; U.S.
 17 IMMIGRATION AND CUSTOMS
 ENFORCEMENT; JASON KNIGHT, Acting Field
 18 Office Director, EXECUTIVE OFFICE FOR
 IMMIGRATION REVIEW; SIRCE OWEN,
 19 Acting Director for Executive Office of
 Immigration Review, in her official capacity; LAS
 20 VEGAS IMMIGRATION COURT; JOHN
 MATTOS, Warden, Nevada Southern Detention
 21 Facility, in his official capacity,

22 Defendants-Respondents.

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Counsel for Plaintiffs-Petitioners

*Applications for admission pro hac vice forthcoming

JOINT STATUS REPORT

1
2 The undersigned attorneys for Plaintiffs-Petitioners (Plaintiffs' Counsel) and the
3 undersigned attorneys for Defendants-Respondents (Defendants' Counsel) hereby submit this
4 Joint Status Report.

5 On October 17, 2025, the Court ordered pre-certification discovery in *Dominguez-Lara,*
6 *et al. v. Noem, et al.*, No. 2:25-cv-01553-RFB-BNW, ECF No. 27 (D. Nev. Aug. 20, 2025). The
7 case was consolidated with *Maldonado Vazquez v. Feeley, et al.*, No: 2:25-cv-01542-RFB-EJY (D.
8 Nev. Aug. 19, 2025) on October 17, 2025, and *Jacobo-Ramirez et al. v. Noem et al.*, No. 2:25-cv-
9 02136-RFB-MDC (D. Nev. Oct. 30, 2025) on October 31, 2025, for discovery purposes only.
10 Related to such discovery, the Court ordered that on or before November 5, 2025, a stipulated
11 protective order be circulated by Respondents and signed by all counsel for the above-mentioned
12 matters. *See* Mins. of Proceedings, *Jacobo-Ramirez et al. v. Noem et al.* 2:25-cv-02136-RFB-
13 MDC, ECF No. 5 (D. Nev. Oct. 30, 2025); *Dominguez-Lara, et al. v. Noem, et al.*, 2:25-cv-01553-
14 RFB-BNW, ECF No. 37 (D. Nev. Aug. 20, 2025); *Maldonado Vazquez v. Feeley, et al.*, No: 2:25-
15 cv-01542-RFB-EJY, ECF No. 43 (D. Nev. Aug. 19, 2025). The Court further ordered that
16 Respondents provide to Plaintiffs' Counsel the names, A numbers, and dates of detention regarding
17 the 185 detainees identified by DHS as applicants for admission subject to the mandatory detention
18 under § 1225(b)(2) on or before November 5, 2025. *Id.*

19 On November 4, 2025, at 3:50 p.m. PT, Defendants' Counsel circulated a draft of the
20 protective order for review and approval. Counsel for Plaintiffs-Petitioners *Jacobo-Ramirez et al.*
21 (ACLU Counsel) responded shortly after informing Defendants' Counsel that they would review
22 the protective order and would reach out with any concerns or changes the next morning. On
23 November 5, 2025, at 1:41 p.m. PT, ACLU Counsel circulated proposed edits to the protective
24 order. Additionally, Counsel for *Maldonado Vazquez* and *Dominguez-Lara, et al.* requested edits

1 via email. Defendants' Counsel responded the same day and stated that they would need additional
2 time to review the draft and allow Department of Homeland Security (DHS) to provide comments
3 on the changes as several agency contacts are located on the East Coast and, because of the three-
4 hour time difference, the request was received late in the day for the East Coast. Defendants'
5 Counsel indicated that they expected to have approval by November 6, 2025. The parties filed a
6 joint status report on November 5, 2025, requesting that the deadline to submit a signed protective
7 order be continued to November 7, 2025.

8 On November 6, 2025, at 3:12 p.m. PT, Defendants' Counsel contacted Plaintiffs'
9 Counsel via email and informed them additional time was needed for DHS to review the edits
10 proposed by ACLU Counsel. Defendants' Counsel stated that she could circulate a final draft of
11 the protective order on November 10, 2025, and suggested that Plaintiffs' Counsel draft a joint
12 status report to inform the Court of the status of the protective order. ACLU Counsel responded
13 shortly after and indicated a willingness to draft the report, provided that Defendants' counsel
14 clarify: 1) when they anticipate receiving approval of the edits; 2) whether they anticipate any
15 other delays because of the protective order; and 3) the status of the information related to the
16 identified 185 detainees that was ordered to be turned over on or before November 5, 2025, and
17 what confidential information is contained within those documents, if any. To that end,
18 Defendants' Counsel stated that they anticipate getting DHS' position on the recommended edits
19 no later than the morning of November 10, 2025, and any additional delays will depend on how
20 soon the parties can agree on a final draft of the protective order. Regarding the delay in producing
21 the names, A numbers, and dates of detention regarding the 185 detainees identified by DHS as
22 applicants for admission subject to the mandatory detention under § 1225(b)(2), Defendants'
23 Counsel expressed that they anticipate that the information will be provided within one day of
24 signing and filing the protective order.

1 Because Defendants' Counsel has indicated that additional delays may occur, which
2 cannot be assessed until DHS provides their position on the proposed edits, it remains uncertain
3 whether their proposed deadline of November 10, 2025, will allow sufficient time for the parties
4 to complete and file a signed protective order before the November 13, 2025, status conference.

5 The parties are in communication with each other concerning the timelines, and in the
6 meantime respectfully request that the deadline to submit a signed protective order be continued
7 to November 10, 2025.

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1 Dated: November 6, 2025

Dated: November 6, 2025

2 **Counsel for Petitioners (consolidated):**

SIGAL CHATTAH
Acting United States Attorney

3 **LIPP LAW LLC**

/s/ Virginia Tomova

4 */s/ Daniel Lippman*

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7 */s/ Karen S. Monrreal Salazar*

8 KAREN S. MONRREAL SALAZAR

9 **ACLU OF NEVADA**

10 */s/ Sadmira Ramic*

11 SADMIRA RAMIC

12 **UNLV IMMIGRATION CLINIC**

13 */s/ Michael Kagan*

14 MICHAEL KAGAN

15 **PERRETTA LAW OFFICE**

16 */s/ Leonor Perretta*

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