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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,

12 vs.

**REPLY IN SUPPORT OF NAMED
 PLAINTIFFS' MOTION FOR A
 PRELIMINARY INJUNCTION**

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

22 Defendants-Respondents.

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**Admitted pro hac vice*

1 Plaintiffs-Petitioners (“Named Plaintiffs”) submit this reply in support of their Motion for
2 a Preliminary Injunction (ECF No. 18).

3 **MEMORANDUM OF POINTS AND AUTHORITIES**

4 **I. Relevant Background**

5 On November 6, 2025, Named Plaintiffs filed a Motion for a Preliminary Injunction. ECF
6 No. 18. The Court ordered Defendants-Respondents (“Defendants”) to respond to the motion by
7 November 12, 2025, at 12:00 p.m. ECF No. 19. The Court further ordered that if Defendants have
8 no new arguments to offer that have not already been addressed by the Court, they may so indicate
9 by reference to their previous briefing, while reserving appellate rights. *Id.* Defendants did not file
10 a response by this deadline.

11 On November 13, 2025, a hearing on the Motion for a Preliminary Injunction was held.
12 The Court highlighted that Defendants did not file a response and stated that unless Defendants
13 had new arguments in opposition to the motion that were not addressed by the Court in rulings on
14 similar issues in other cases, it will issue an order on the motion by referencing the Defendants’
15 arguments in opposition in those related matters. ECF No. 23. The Court permitted Defendants to
16 file a response by the end of the day.

17 That same day, Defendants filed an Opposition to Named Plaintiffs’ Motion for a
18 Preliminary Injunction. ECF No. 22. The opposition incorporated by reference the Defendants’
19 arguments in prior filings in *Samuel Sanchez Aparicio v. Kristi Noem et al.*, Case No. 2:25-cv-
20 01919-GMN-DJA (ECF No. 14), *Rogelio Berto Mendez v. Kristi Noem et al.*, Case No. 2:25-cv-
21 02062-RFB-MDC (ECF No. 14), *Jefferson Dominguez-Lara, et al. v. Noem, et al.*, Case No. 2:25-
22 cv-01553-RFB-BNW (ECF No. 17), and *Eduardo Alvarado Gonzalez v. Kristi Noem et al.*, Case
23 No. 2:25-cv-01599 (ECF No. 18). Additionally, Defendants noted the following recent decisions
24 to support their position in this case: *Pena v. Hyde*, No. 25-11983, 2025 WL 2108913 (D. Mass.

1 July 28, 2025); *Chavez v. Noem*, No. 25-02325, 2025 WL 2730228 (S.D. Cal. Sept. 24, 2025);
2 *Vargas Lopez v. Trump*, No. 25-526, 2025 WL 2780351 (D. Neb. Sept. 30, 2025); *Barrios*
3 *Sandoval v. Acuna*, No. 25-01467, 2025 WL 3048926 (W.D. La. Oct. 31, 2025); *Silva Oliveira v.*
4 *Patterson*, No. 25-01463, 2025 WL 3095972 (W.D. La. Nov. 4, 2025); *Mejia Olalde v. Noem*, No.
5 25-00168, 2025 WL 3131942 (E.D. Mo. Nov. 10, 2025).

6 Named Plaintiffs submit this reply to address the additional legal authority cited by
7 Defendants outside of the arguments incorporated by reference from other filings in relevant cases.

8 **II. Additional Orders Holding that Section 1226(a) Governs the Detention of Named**
9 **Plaintiffs.**

10 As discussed in Plaintiffs' motion, numerous courts throughout the United States have
11 rejected the government's position that mandatory detention under Section 1225(b)(2) applies to
12 noncitizens who are arrested in the United States after entering without inspection and held that
13 Section 1226(a) discretionary detention applies. *See* ECF No. 18 at 7, 9 & n.1. Defendants cite six
14 decisions to argue "that this Court now has a meaningful opportunity to revisit its prior
15 interpretations with the benefit of a growing body of well-reasoned and persuasive authority." ECF
16 No. 22 at 5. However, Defendants fail to recognize the tsunami of cases that far outnumber the
17 decisions that adopt the government's novel interpretation of the statute that equates "applicants
18 for admission" with "seeking admission," and unconvincingly ignore the INA's text, context,
19 structure, regulations, legislative history, and longstanding agency practice.

20 For the Court's reference, Plaintiffs have collected below the decisions rejecting the
21 government's position since the BIA's decision in *Yajure-Hurtado* was published, excluding those
22 already cited in Plaintiffs' Motion for Preliminary Injunction.

23 Decisions issued by courts within the jurisdiction of the United States Court of Appeals for
24 the Ninth Circuit include:

- 1 • *Zaragoza Mosqueda v. Noem*, No. 5:25-CV-02304 CAS (BFM), 2025 WL 2591530 (C.D. Cal. Sept. 8, 2025);
- 2 • *Cuevas Guzman v. Andrews*, No. 1:25-CV-01015-KES-SKO (HC), 2025 WL 2617256 (E.D. Cal. Sept. 9, 2025);
- 3 • *Salcedo Aceros v. Kaiser*, No. 25-CV-06924-EMC (EMC), 2025 WL 2637503 (N.D. Cal. Sept. 12, 2025);
- 4 • *Oliveros v. Kaiser*, No. 25-CV-07117-BLF, 2025 WL 2677125 (N.D. Cal. Sept. 18, 2025);
- 5 • *Lepe v. Andrews*, --- F. Supp. 3d ---, 2025 WL 2716910 (E.D. Cal. Sept. 23, 2025);
- 6 • *Roa v. Albarran*, No. 25-CV-07802, 2025 WL 2732923 (N.D. Cal. Sept. 25, 2025);
- 7 • *Valencia Zapata v. Kaiser*, --- F. Supp. 3d ---, 2025 WL 2741654 (N.D. Cal. Sept. 26, 2025);
- 8 • *Santiago Flores v. Noem*, No. 5:25-cv-02490-AB-AJR, 2025 WL 3050062 (C.D. Cal. Sept. 29, 2025);
- 9 • *Cordero Pelico v. Kaiser*, No. 25-CV-07286, 2025 WL 2822876 (N.D. Cal. Oct. 3, 2025);
- 10 • *Echevarria v. Bondi*, No. 25-CV-03252, 2025 WL 2821282 (D. Ariz. Oct. 3, 2025);
- 11 • *Alvarenga Matute v. Wofford*, No. 25-CV-01206, 2025 WL 2817795 (E.D. Cal. Oct. 3, 2025);
- 12 • *Ortiz Donis v. Chestnut*, No. 1:25-CV-01228 JLT SAB, 2025 WL 2879514 (E.D. Cal. Oct. 9, 2025);
- 13 • *Alvarez Chavez v. Kaiser*, No. 3:25-cv-06984-LB, 2025 WL 2909526 (N.D. Cal. Oct. 9, 2025);
- 14 • *Garcia v. Noem*, No. 5:25-CV-02771-ODW (PDX), 2025 WL 2986672 (C.D. Cal. Oct. 22, 2025);
- 15 • *Equivel-Ipina v. Larose*, No. 25-CV-2672 JLS (BLM), 2025 WL 2998361 (S.D. Cal. Oct. 24, 2025);
- 16 • *J.A.C.P. v. Wofford*, No. 1:25-CV-01354-KES-SKO (HC), 2025 WL 3013328 (E.D. Cal. Oct. 27, 2025);
- 17 • *Ruiz Yarleque v. Noem*, No. 5:25-CV-02836-MEMF-SP, 2025 WL 3043936, (C.D. Cal. Oct. 31, 2025);
- 18 • *Beltran v. Noem*, No. 25CV2650-LL-DEB, 2025 WL 3078837 (S.D. Cal. Nov. 4, 2025);
- 19 • *Menjivar Sanchez v. Wofford*, No. 1:25-CV-01187-SKO (HC), 2025 WL 3089712 (E.D. Cal. Nov. 5, 2025);
- 20 • *Zaragoza v. Noem*, 5:25-cv-2925-HDV-PVC (C.D. Cal. Nov. 7, 2025) (Dkt. 8);
- 21 • *Otilio B.F. v. Andrews*, 1:25-cv-01398-KES-EPG (HC), -- F. Supp. 3d ----, 2025 WL 3152480 (E.D. Cal. Nov. 11, 2025);
- 22 • *Sharan S. v. Chestnut*, No. 1:25-CV-01427-KES-SKO (HC), 2025 WL 3167826 (E.D. Cal. Nov. 12, 2025);
- 23 • *Moran Bernal v. Noem*, No. 5:25-cv-2995-CV-SSC (C.D. Cal. Nov. 12, 2025) (Dkt. 9);
- 24 • *Pelico Calel v. Larose*, No. 3:25-CV-02883-GPC-JLB, 2025 WL 3171898 (S.D. Cal. Nov. 13, 2025);
- *Maravilla Amaya v. Noem*, No. 25CV2892-BTM-DEB, 2025 WL 3182998 (S.D. Cal. Nov. 13, 2025);
- *Estuardo Marin v. Andrews*, No. 1:25-CV-01422-SAB-HC, 2025 WL 3171484 (E.D. Cal. Nov. 13, 2025); and,

- 1 • *Ramandi v. Field Office Dir., ICE ERO San Francisco*, No. 1:25-CV-01462-JLT-EPG, 2025 WL 3182732 (E.D. Cal. Nov. 14, 2025).

2 Additional decisions from courts outside the Ninth Circuit rejecting the government's
3 position and holding that § 1226(a) applied to petitioners include:

- 4 • *Sampiao v. Hyde*, No. 1:25-CV-11981-JEK, 2025 WL 2607924 (D. Mass. Sept. 9, 2025);
5 • *Hernandez Marcelo v. Trump*, --- F. Supp. 3d ----, 2025 WL 2741230 (S.D. Iowa Sept. 10, 2025);
6 • *Lopez Santos v. Noem*, No. 3:25-CV-01193, 2025 WL 2642278 (W.D. La. Sept. 11, 2025);
7 • *Garcia Cortes v. Noem*, No. 1:25-CV-02677-CNS, 2025 WL 2652880 (D. Colo. Sept. 16, 2025);
8 • *Salazar v. Dedos*, No. 1:25-CV-00835-DHU-JMR, 2025 WL 2676729 (D.N.M. Sept. 17, 2025);
9 • *Beltran Barrera v. Tindall*, No. 3:25-CV-541-RGJ, 2025 WL 2690565 (W.D. Ky. Sept. 19, 2025);
10 • *Hasan v. Crawford*, No. 1:25-CV-1408 (LMB/IDD), 2025 WL 2682255 (E.D. Va. Sept. 19, 2025);
11 • *Chogollo Chafra v. Scott*, No. 25-CV-00437, 2025 WL 2688541 (D. Me. Sept. 22, 2025);
12 • *Singh v. Lewis*, No. 25-CV-96, 2025 WL 2699219 (W.D. Ky. Sept. 22, 2025);
13 • *Giron Reyes v. Lyons*, --- F. Supp. 3d ---, 2025 WL 2712427 (N.D. Iowa Sept. 23, 2025);
14 • *Brito Barrajas v. Noem*, No. 25-CV-00322, 2025 WL 2717650 (S.D. Iowa Sept. 23, 2025);
15 • *Lopez v. Hardin*, No. 25-CV-830, 2025 WL 2732717 (M.D. Fla. Sept. 25, 2025);
16 • *Rivera Zumba v. Bondi*, No. 25-CV-14626, 2025 WL 2753496 (D.N.J. Sept. 26, 2025);
17 • *Inlago Tocagon v. Moniz*, --- F. Supp. 3d ---, 2025 WL 2778023 (D. Mass. Sept. 29, 2025);
18 • *Romero-Nolasco v. McDonald*, --- F. Supp. 3d ---, 2025 WL 2778036 (D. Mass. Sept. 29, 2025);
19 • *Chang Barrios v. Shepley*, No. 25-CV-00406, 2025 WL 2772579 (D. Me. Sept. 29, 2025);
20 • *Alves da Silva v. ICE*, No. 25-CV-284, 2025 WL 2778083 (D.N.H. Sept. 29, 2025);
21 • *J.U. v. Maldonado*, No. 25-CV-04836, 2025 WL 2772765 (E.D.N.Y. Sept. 29, 2025);
22 • *Quispe v. Crawford*, No. 25-CV-1471, 2025 WL 2783799 (E.D. Va. Sept. 29, 2025);
23 • *Chiliquinga Yumbillo v. Stamper*, No. 25-CV-00479, 2025 WL 2783642 (D. Me. Sept. 30, 2025);
24 • *Morales v. Plymouth Cnty. Corr. Facility*, No. 25-CV-12602 (D. Mass. Sept. 30, 2025) (Dkt. 15);
• *Santiago Helbrum v. Williams*, No. 4:25-cv-00349-SHL-SBJ, 2025 WL 2840273 (S.D. Iowa Sept. 30, 2025);
• *Quispe-Ardiles v. Noem*, No. 25-CV-01382, 2025 WL 2783800 (E.D. Va. Sept. 30, 2025);
• *Esmeralda Mendoza v. Hyde*, No. 25-12815-JEK (D. Mass. Oct. 1, 2025) (Dkt. 12);
• *Chavez Chavez v. Hyde*, No. 25-12571-JEK (D. Mass. Oct. 1, 2025) (Dkt. 11);
• *De Oliveira Gomes v. Hyde*, No. 25-12737-JEK (D. Mass. Oct. 1, 2025) (Dkt. 8);
• *Reynosa Tejada v. Moniz*, No. 1:25-cv-12731-LTS (D. Mass. Oct. 1, 2025) (Dkt. 10);
• *D.S. v. Bondi*, No. 25-CV-3682, 2025 WL 2802947 (D. Minn. Oct. 1, 2025);

- 1 • *De Miranda Silva v. Hyde*, No. 25-12679-ADB (D. Mass. Oct. 2, 2025) (Dkt. 9);
- 2 • *De Sousa v. Hyde*, No. 25-12736-BEM (D. Mass. Oct. 2, 2025) (Dkt. 8);
- 3 • *Goncalves Xavier v. Moniz*, No. 25-12798-JEK (D. Mass. Oct. 2, 2025) (Dkt. 14);
- 4 • *Rocha v. Hyde*, No. 25-CV-12584, 2025 WL 2807692 (D. Mass. Oct. 2, 2025);
- 5 • *Chanaguano Caiza v. Scott*, No. 25-CV-00500, 2025 WL 2806416 (D. Me. Oct. 2, 2025);
- 6 • *Moreira Neto v. FCI Berlin, Warden*, No. 25-311-JL-TSM (D.N.H. Oct. 2, 2025) (Dkt. 14);
- 7 • *Ayala Casun v. Hyde*, No. 25-CV-427, 2025 WL 2806769 (D.R.I. Oct. 2, 2025);
- 8 • *Guzman Alfaro v. Wamsley*, No. 25-CV-01706, 2025 WL 2822113 (W.D. Wash. Oct. 2, 2025);
- 9 • *Escobar v. Hyde*, No. 25-CV-12620, 2025 WL 2823324 (D. Mass. Oct. 3, 2025);
- 10 • *Martins Valadares v. Hyde*, No. 1:25-cv-12693-ADB (D. Mass. Oct. 3, 2025) (Dkt. 8);
- 11 • *Ribeiro Da Silva v. Hyde*, No. 1:25-cv-12756-JEK (D. Mass. Oct. 3, 2025) (Dkt. 9);
- 12 • *Shinwari v. Hyde*, No. 1:25-cv-12021-LTS (D. Mass. Oct. 3, 2025) (Dkt. 37);
- 13 • *Artiga v. Genalo*, No. 25-CV-5208, 2025 WL 2829434 (E.D.N.Y. Oct. 5, 2025);
- 14 • *Diaz Dimas et al. v. Moniz*, No. 1:25-cv-12665-LTS (D. Mass. Oct. 6, 2025) (Dkt. 14);
- 15 • *Pereira De Souza v. Hyde*, No. 1:25-cv-12532-RGS (D. Mass. Oct. 6, 2025) (Dkt. 13);
- 16 • *Velasco-Luis v. Hyde*, No. 1:25-cv-12747-RGS (D. Mass. Oct. 6, 2025) (Dkt. 8);
- 17 • *Hyppolite v. Noem*, No. 25-CV-4304, 2025 WL 2829511 (E.D.N.Y. Oct. 6, 2025);
- 18 • *Cardoso De Sa v. Hyde*, No. 1:25-cv-12788-RGS (D. Mass. Oct. 7, 2025) (Dkt. 9);
- 19 • *Cardoso Dos Santos v. Hyde*, No. 1:25-cv-12787-RGS (D. Mass. Oct. 7, 2025) (Dkt. 7);
- 20 • *Carmona Reyes v. Hyde*, No. 1:25-cv-12781-RGS (D. Mass. Oct. 7, 2025) (Dkt. 8);
- 21 • *Da Silva v. Hyde*, No. 1:25-cv-12638-IT (D. Mass. Oct. 7, 2025) (Dkt. 10);
- 22 • *Fonseca De Sa v. Hyde*, No. 1:25-cv-12734-ADB (D. Mass. Oct. 7, 2025) (Dkt. 8);
- 23 • *S.D.B.B. v. Johnson*, No. 1:25-CV-882, 2025 WL 2845170 (M.D.N.C. Oct. 7, 2025);
- 24 • *Buenrostro-Mendez v. Bondi*, No. 4:25-cv-03726 (S.D. Tex. Oct. 7, 2025) (Dkt. 18);
- *Goncalves Bento et al. v. Moniz*, No. 1:25-cv-12498-RGS (D. Mass. Oct. 8, 2025) (Dkt. 8);
- *Eliseo A.A. v. Olson*, No. CV 25-3381 (JWB/DJF), 2025 WL 2886729 (D. Minn. Oct. 8, 2025);
- *Padron Covarrubias v. Vergara*, No. 5:25-cv-00112, 2025 WL 2950097 (S.D. Tex. Oct. 8, 2025);
- *Lopez Lopez v. Hyde*, No. 1:25-cv-12725-IT (D. Mass. Oct. 8, 2025) (Dkt. 14);
- *De Los Reyes Gonzalez v. McDonald*, No. 1:25-cv-12644-RGS (D. Mass. Oct. 9, 2025) (Dkt. 10);
- *Pereira v. Hyde*, No. 1:25-cv-12775-ADB (D. Mass. Oct. 9, 2025) (Dkt. 8);
- *Rosa Venancio v. Hyde*, No. 1:25-cv-12616-IT (D. Mass. Oct. 9, 2025) (Dkt. 12);
- *Seidu v. Moniz*, No. 1:25-cv-12723-BEM (D. Mass. Oct. 9, 2025) (Dkt. 11);
- *Tawela v. Wesling*, No. 1:25-cv-12794-AK (D. Mass. Oct. 9, 2025) (Dkt. 11);
- *Vasconcelos De Castro v. Hyde*, No. 1:25-cv-12785-AK (D. Mass. Oct. 9, 2025) (Dkt. 13);
- *Landaverde v. Hyde*, No. 1:25-cv-12552-MJJ (D. Mass. Oct. 10, 2025) (Dkt. 16);
- *Lopez Orellana v. Moniz*, No. 1:25-cv-12908-PBS (D. Mass. Oct. 10, 2025) (Dkt. 12);
- *Monzon Guzman v. Hyde*, No. 1:25-cv-12593-MJJ (D. Mass. Oct. 10, 2025) (Dkt. 14);
- *Orellana-Serrano v. Hyde*, No. 1:25-cv-12646-MJJ (D. Mass. Oct. 10, 2025) (Dkt. 18);

- 1 • *Castillo v. Lyons*, No. 25-CV-16219 (MEF), 2025 WL 2940990 (D.N.J. Oct. 10, 2025);
- 2 • *Alejandro v. Olson*, No. 1:25-CV-02027-JPH-MKK, 2025 WL 2896348 (S.D. Ind. Oct. 11, 2025);
- 3 • *Singh v. Lyons*, No. 1:25-CV-01606-AJT-WBP, 2025 WL 2932635 (E.D. Va. Oct. 14, 2025);
- 4 • *Merino v. Ripa*, No. 25-23845-CIV, 2025 WL 2941609 (S.D. Fla. Oct. 15, 2025);
- 5 • *Puga v. Assistant Field Off. Dir., Krome N. Serv. Processing Ctr.*, No. 25-24535-CIV, 2025 WL 2938369 (S.D. Fla. Oct. 15, 2025);
- 6 • *Ochoa v. Noem*, No. 25 CV 10865, 2025 WL 2938779 (N.D. Ill. Oct. 16, 2025);
- 7 • *Andrade Hernandez v. Moniz*, No. 25-12860-ADB (D. Mass. Oct. 16, 2025) (Dkt. 8);
- 8 • *Cruz Avalos v. Moniz*, No. 25-12940-BEM (D. Mass. Oct. 16, 2025) (Dkt. 8);
- 9 • *Chavez Mendoza v. Moniz*, No. 25-12978-PBS (D. Mass. Oct. 16, 2025) (Dkt. 13);
- 10 • *Dume Rivera v. Moniz*, No. 25-12833-FDS (D. Mass. Oct. 16, 2025) (Dkt. 12);
- 11 • *Garcia Liranzo v. Moniz*, No. 25-12930-BEM (D. Mass. Oct. 16, 2025) (Dkt. 11);
- 12 • *Pineda-Chavez v. Moniz*, No. 25-12932-MJJ (D. Mass. Oct. 16, 2025) (Dkt. 9);
- 13 • *Zacarias-Sanchez v. Moniz*, No. 25-12915-BEM (D. Mass. Oct. 16, 2025) (Dkt. 9);
- 14 • *Pérez Piña v. Stamper*, No. 2:25-cv-00509-SDN (D. Me. Oct. 16, 2025) (Dkt. 20);
- 15 • *Hernandez v. Crawford*, No. 1:25-CV-01565-AJT-WBP, 2025 WL 2940702 (E.D. Va. Oct. 16, 2025);
- 16 • *Menjivar Sanchez v. Wofford*, No. 1:25-CV-01187-SKO (HC), 2025 WL 2959274 (E.D. Cal. Oct. 17, 2025);
- 17 • *Garcia Guaman v. Hyde*, No. 25-12879-ADB (D. Mass. Oct. 17, 2025) (Dkt. 7);
- 18 • *Nogueira Da Silva v. Hyde*, No. 25-12931-LTS (D. Mass. Oct. 17, 2025) (Dkt. 10);
- 19 • *Zamora v. Noem*, 25-12750-NMG, 2025 WL 2958879 (D. Mass. Oct. 17, 2025);
- 20 • *Contreras-Cervantes v. Raycraft*, No. 2:25-CV-13073, 2025 WL 2952796 (E.D. Mich. Oct. 17, 2025);
- 21 • *Diaz Sandoval v. Raycraft*, No. 2:25-CV-12987, 2025 WL 2977517 (E.D. Mich. Oct. 17, 2025);
- 22 • *Pacheco Mayen v. Raycraft*, No. 2:25-CV-13056, 2025 WL 2978529 (E.D. Mich. Oct. 17, 2025);
- 23 • *Sanchez Alvarez v. Noem*, No. 1:25-CV-1090, 2025 WL 2942648 (W.D. Mich. Oct. 17, 2025);
- 24 • *H.G.V.U. v. Smith*, No. 25 CV 10931, 2025 WL 2962610 (N.D. Ill. Oct. 20, 2025);
- *De La Cruz v. Noem*, No. 25-cv-150-LTS (N.D. Iowa Oct. 20, 2025) (Dkt. 24);
- *Da Silva v. Moniz*, No. 25-12563-LTS (D. Mass. Oct. 20, 2025) (Dkt. 15);
- *Hercules Acosta v. Hyde*, No. 25-13011-AK (D. Mass. Oct. 20, 2025) (Dkt. 10);
- *Monzon v. Hyde*, No. 25-12594-RGS (D. Mass. Oct. 20, 2025) (Dkt. 15);
- *Ruiz Barahona v. Hyde*, No. 25-12551-IT (D. Mass. Oct. 20, 2025) (Dkt. 13);
- *Miguel v. Noem*, No. 25 C 11137, 2025 WL 2976480 (N.D. Ill. Oct. 21, 2025);
- *Maldonado de Leon v. Baker*, No. CV 25-3084-TDC, 2025 WL 2968042 (D. Md. Oct. 21, 2025);
- *Araujo Da Silva v. Bondi*, No. 25-12672-DJC (D. Mass. Oct. 21, 2025) (Dkt. 16);
- *Casio-Mejia v. Raycraft*, No. 2:25-CV-13032, 2025 WL 2976737 (E.D. Mich. Oct. 21, 2025);

- 1 • *Contreras-Lomeli v. Raycraft*, No. 2:25-CV-12826, 2025 WL 2976739 (E.D. Mich. Oct. 21, 2025);
- 2 • *Jimenez Garcia v. Raybon*, No. 2:25-CV-13086, 2025 WL 2976950 (E.D. Mich. Oct. 21, 2025);
- 3 • *Santos Franco v. Raycraft*, No. 2:25-CV-13188, 2025 WL 2977118 (E.D. Mich. Oct. 21, 2025);
- 4 • *Herrera Avila v. Bondi*, No. CV 25-3741 (JRT/SGE), 2025 WL 2976539, at (D. Minn. Oct. 21, 2025);
- 5 • *Buestan v. Chu*, No. CV 25-16034 (MEF), 2025 WL 2972252 (D.N.J. Oct. 21, 2025);
- 6 • *Flores Pineda v. Simon*, No. 1:25-CV-01616-AJT-WEF, 2025 WL 2980729 (E.D. Va. Oct. 21, 2025);
- 7 • *Padilla v. Noem*, No. 25 CV 12462, 2025 WL 2977742 (N.D. Ill. Oct. 22, 2025);
- 8 • *Coelho Gomes v. Moniz*, No. 25-13021-MJJ (D. Mass. Oct. 22, 2025) (Dkt. 8);
- 9 • *Cortez Rivera v. Hyde*, No. 25-12390-IT, 2025 WL 2977900 (D. Mass. Oct. 22, 2025);
- 10 • *Moreira Aguiar v. Moniz*, No. 25-12706-IT, 2025 WL 2987656 (D. Mass. Oct. 22, 2025);
- 11 • *Soto v. Soto*, --- F. Supp. 3d ----, 2025 WL 2976572 (D.N.J. Oct. 22, 2025);
- 12 • *Hernandez Vazquez v. Baltasar*, No. 25-cv-03049-GPG (D. Colo. Oct. 23, 2025) (Dkt. 22);
- 13 • *Da Cruz v. Moniz*, No. 25-13067-MJJ (D. Mass. Oct. 23, 2025) (Dkt. 8);
- 14 • *Contreras Maldonado v. Cabezas*, No. CV 25-13004, 2025 WL 2985256 (D.N.J. Oct. 23, 2025);
- 15 • *Lomeu v. Soto*, No. 25CV16589 (EP), 2025 WL 2981296 (D.N.J. Oct. 23, 2025);
- 16 • *Del Cid v. Bondi*, No. 3:25-CV-00304, 2025 WL 2985150 (W.D. Pa. Oct. 23, 2025);
- 17 • *Nava Hernandez v. Baltazar*, No. 1:25-cv-03094-CNS, 2025 WL 2996643 (D. Colo. Oct. 24, 2025);
- 18 • *Patel v. Crowley*, No. 25 C 11180, 2025 WL 2996787 (N.D. Ill. Oct. 24, 2025);
- 19 • *Ajtzac Osorio v. Hyde*, No. 25-12678-DJC (D. Mass. Oct. 24, 2025) (Dkt. 17);
- 20 • *Arias Lopez v. Hyde*, No. 25-12680-NMG (D. Mass. Oct. 24, 2025) (Dkt. 21);
- 21 • *Mezdaoui v. Moniz*, No. 25-12999-JEK (D. Mass. Oct. 24, 2025) (Dkt. 9);
- 22 • *Aguilar Guerra v. Joyce*, No. 2:25-cv-00534-SDN (D. Me. Oct. 24, 2025) (Dkt. 18);
- 23 • *Rodriguez Carmona, v. Noem*, No. 1:25-CV-1131, 2025 WL 2992222 (W.D. Mich. Oct. 24, 2025);
- 24 • *Yobani v. Noem*, No. 1:25-CV-01666-AJT-LRV, 2025 WL 2997507 (E.D. Va. Oct. 24, 2025);
- *Martinez-Elvir v. Olson*, No. 3:25-CV-589-CHB, 2025 WL 3006772 (W.D. Ky. Oct. 27, 2025);
- *Orellana v. Noem*, No. 4:25-CV-112-RGJ, 2025 WL 3006763 (W.D. Ky. Oct. 27, 2025);
- *Pineda Velasquez v. Noem*, No. CV GLR-25-3215, 2025 WL 3003684 (D. Md. Oct. 27, 2025);
- *Chavez Castillo v. Moniz*, No. 25-13091-MJJ (D. Mass. Oct. 27, 2025) (Dkt. 8);
- *De Moura v. Moniz*, No. 25-13058-IT (D. Mass. Oct. 27, 2025) (Dkt. 10);
- *Lopez-Monteros v. Hyde*, No. 25-12629-NMG (D. Mass. Oct. 27, 2025) (Dkt. 21);
- *Mejia Arias v. Moniz*, No. 25-13019-IT (D. Mass. Oct. 27, 2025) (Dkt. 8);
- *Palencia Morales v. Hyde*, No. 25-13031-DJC (D. Mass. Oct. 27, 2025) (Dkt. 8);

- 1 • *Gimenez Gonzalez v. Raycraft*, No. 25-CV-13094, 2025 WL 3006185 (E.D. Mich. Oct. 27, 2025);
- 2 • *Tomas Elias v. Hyde*, No. 25-CV-540-JJM-AEM, 2025 WL 3004437 (D.R.I. Oct. 27, 2025);
- 3 • *Duarte Escobar v. Perry*, No. 3:25CV758, 2025 WL 3006742 (E.D. Va. Oct. 27, 2025);
- 4 • *Puerto-Hernandez v. Lynch*, No. 1:25-CV-1097, 2025 WL 3012033 (W.D. Mich. Oct. 28, 2025);
- 5 • *J.G.O. v. Francis*, No. 25-CV-7233 (AS), 2025 WL 3040142 (S.D.N.Y. Oct. 28, 2025);
- 6 • *Zolakio v. Hyde*, No. 25-13040-RGS (D. Mass. Oct. 28, 2025) (Dkt. 8);
- 7 • *Patel v. Almodovar*, No. CV 25-15345 (SDW), 2025 WL 3012323 (D.N.J. Oct. 28, 2025);
- 8 • *Corona Diaz v. Olson*, No. 25 CV 12141, 2025 WL 3022170 (N.D. Ill. Oct. 29, 2025);
- 9 • *Marin Garcia v. Noem*, No. 1:25-CV-1271, 2025 WL 3017200 (W.D. Mich. Oct. 29, 2025);
- 10 • *Rodriguez v. Noem*, No. 1:25-CV-1196, 2025 WL 3022212 (W.D. Mich. Oct. 29, 2025);
- 11 • *Ramirez Valverde v. Olson*, No. 25-CV-1502, 2025 WL 3022700 (E.D. Wis. Oct. 29, 2025);
- 12 • *Singh v. Bondi*, No. 1:25-CV-02101-SEB-TAB, 2025 WL 3029524 (S.D. Ind. Oct. 30, 2025);
- 13 • *Ayala Amaya v. Bondi*, No. 25-CV-16428-ESK, 2025 WL 3033880 (D.N.J. Oct. 30, 2025);
- 14 • *Astudillo v. Hyde*, No. CV 25-551-JJM-AEM, 2025 WL 3035083 (D.R.I. Oct. 30, 2025);
- 15 • *Tejada Polanco v. Hyde*, No. 25-CV-552-JJM-AEM, 2025 WL 3033926 (D.R.I. Oct. 30, 2025);
- 16 • *Lopez Lopez v. Sheehan*, No. 25-CV-4052-CJW-KEM, 2025 WL 3046183 (N.D. Iowa Oct. 30, 2025)
- 17 • *Artola Arauz v. Baltazar*, No. 1:25-cv-03260-CNS (D. Colo. Oct. 31, 2025) (Dkt. 16);
- 18 • *Cervantes Arredondo v. Baltazar*, No. 1:25-cv-03040-RBJ (D. Colo. Oct. 31, 2025) (Dkt. 21);
- 19 • *Garcia v. Noem*, No. 2:25-CV-00879-SPC-NPM, 2025 WL 3041895 (M.D. Fla. Oct. 31, 2025);
- 20 • *Rosales Ponce v. Olson*, No. 25-CV-13037, 2025 WL 3049785 (N.D. Ill. Oct. 31, 2025);
- 21 • *Valencia v. Noem*, No. 25-CV-12829, 2025 WL 3042520 (N.D. Ill. Oct. 31, 2025);
- 22 • *Escobar-Ruiz v. Raycraft*, No. 1:25-CV-1232, 2025 WL 3039255 (W.D. Mich. Oct. 31, 2025);
- 23 • *Ruiz Mejia v. Noem*, No. 1:25-CV-1227, 2025 WL 3041827 (W.D. Mich. Oct. 31, 2025);
- 24 • *De Jesus Ramirez v. Noem*, No. 1:25-CV-1261, 2025 WL 3039266 (W.D. Mich. Oct. 31, 2025);
- *Godinez-Lopez v. Ladwig*, No. 2:25-CV-02962-SHL-ATC, 2025 WL 3047889 (W.D. Tenn. Oct. 31, 2025);
- *J.A.M. v. Streeval*, No. 4:25-CV-342 (CDL), 2025 WL 3050094 (M.D. Ga. Nov. 1, 2025);
- *D.E.C.T. v. Noem*, No. 25 C 12463, 2025 WL 3063650 (N.D. Ill. Nov. 3, 2025);
- *Flores v. Olson*, No. 25 C 12916, 2025 WL 3063540 (N.D. Ill. Nov. 3, 2025);
- *Mboup v. Field Off. Dir. of New Jersey Immigr. & Customs Enf't*, No. 2:25-CV-16882 (MEF), 2025 WL 3062791 (D.N.J. Nov. 3, 2025)

- 1 • *Vargas Ramos v. Rokosky*, No. 25CV15892 (EP), 2025 WL 3063588 (D.N.J. Nov. 3, 2025);
- 2 • *Aguirre Villa v. Normand*, No. 5:25-CV-89, 2025 WL 3095969 (S.D. Ga. Nov. 4, 2025) (R&R);
- 3 • *Alonso v. Tindall*, No. 3:25-CV-652-DJH, 2025 WL 3083920 (W.D. Ky. Nov. 4, 2025);
- 4 • *Salgado Mendoza v. Noem*, No. 1:25-CV-1252, 2025 WL 3077589 (W.D. Mich. Nov. 4, 2025);
- 5 • *Ortiz v. Freden*, No. 25-CV-960-LJV, 2025 WL 3085032 (W.D.N.Y. Nov. 4, 2025);
- 6 • *Reyes Arizmendi v. Noem*, No. 25 C 13041, 2025 WL 3089107 (N.D. Ill. Nov. 5, 2025);
- 7 • *Hernandez Capote v. Sec'y of U.S. Dep't of Homeland Security*, No. 25-13128, 2025 WL 3089756 (E.D. Mich. Nov. 5, 2025);
- 8 • *Lopez Sarmiento v. Perry*, 1:25-cv-01644-AJT-WBP, 2025 WL 3091140 (E.D. Va. Nov. 5, 2025);
- 9 • *Mirzoev v. Olson*, No. 25-CV-12969, 2025 WL 3101969 (N.D. Ill. Nov. 6, 2025);
- 10 • *Vicens-Marquez v. Soto*, No. CV 25-16906 (KSH), 2025 WL 3097496 (D.N.J. Nov. 6, 2025);
- 11 • *Romero Perez v. Francis*, No. 25-CV-8112 (JGK), 2025 WL 3110459 (S.D.N.Y. Nov. 6, 2025);
- 12 • *Vasquez Carmaco v. Noem*, 2025 WL 3119263 (M.D. Fla. Nov. 7, 2025);
- 13 • *Garcia Rios v. Noem*, 2025 WL 3124173 (N.D. Ill. Nov. 7, 2025);
- 14 • *Morales-Martinez v. Raycraft*, No. 25-CV-13303, 2025 WL 3124695 (E.D. Mich. Nov. 7, 2025);
- 15 • *Molina Ochoa v. Noem*, 2025 WL 3125846 (D.N.M. Nov. 7, 2025) (R&R);
- 16 • *Guartazaca Sumba v. Crowley*, No. 1:25-CV-13034, 2025 WL 3126512 (N.D. Ill. Nov. 9, 2025);
- 17 • *Perez-Gomez v. Warden, Camp East Montana Detention Facility*, No. CV 3:25CV773, 2025 WL 3141103 (E.D. Va. Nov. 10, 2025);
- 18 • *Lira Perez v. Noem*, No. 25 C 13442, 2025 WL 3140692 (N.D. Ill. Nov. 10, 2025);
- 19 • *Ramirez Martinez v. Noem*, No. 25-CV-12029, 2025 WL 3145103 (N.D. Ill. Nov. 11, 2025);
- 20 • *Lopez Briseno v. Noem*, No. 25 C 12092, 2025 WL 3145985 (N.D. Ill. Nov. 11, 2025);
- 21 • *Garcia Guevara v. Swearingen*, No. 25 C 12549, 2025 WL 3158151 (N.D. Ill. Nov. 12, 2025);
- 22 • *Adonay E.M. v. Noem*, No. 25-CV-3975 (SRN/DTS), 2025 WL 3157839 (D. Minn. Nov. 12, 2025);
- 23 • *Chilel Chilel v. Sheehan*, No. C25-4053-LTS-KEM, 2025 WL 3158617 (N.D. Iowa Nov. 12, 2025);
- 24 • *Mauricio Diego v. Raycraft*, No. 25-13288, 2025 WL 3159106 (E.D. Mich. Nov. 12, 2025);
- *Contreras Alvarez v. Noem*, No. 1:25-CV-1313, 2025 WL 3151948 (W.D. Mich. Nov. 12, 2025);
- *Lucero Lucero v. Noem*, No. 1:25-CV-1295, 2025 WL 3165235 (W.D. Mich. Nov. 12, 2025);
- *Guaman Naula v. Noem*, No. CV 25-16792 (SDW), 2025 WL 3158490 (D.N.J. Nov. 12, 2025);

- 1 • *Guaita Quinapanta v. Bondi*, No. 25-CV-795-WMC, 2025 WL 3157867 (W.D. Wis. Nov. 12, 2025);
- 2 • *Portillo Martinez v. Hyde*, No. CV 25-11909-BEM, 2025 WL 3152847 (D. Mass. Nov. 12, 2025);
- 3 • *Hernandez Silva v. Bondi*, No. 9:25-cv-251-MJT (E.D. Tex. Nov. 12, 2025) (Dkt. 10) (R&R);
- 4 • *Mariscal Serrano v. Salazar*, No. 25 C 13170, 2025 WL 3171354 (N.D. Ill. Nov. 13, 2025);
- 5 • *Delgado Avila v. Crowley*, No. 2:25-CV-00533-MPB-MJD, --- F. Supp. 3d ----, 2025 WL 3171175 (S.D. Ind. Nov. 13, 2025);
- 6 • *Singh v. Noem*, No. 1:25-CV-1251, 2025 WL 3170855 (W.D. Mich. Nov. 13, 2025)
- 7 • *Cabrera v. Noem*, No. 25 C 12160, 2025 WL 3171288 (N.D. Ill. Nov. 13, 2025);
- 8 • *Caguana-Caguana v. Moniz*, No. 1:25-CV-13142-IT, 2025 WL 3171043 (D. Mass. Nov. 13, 2025);
- 9 • *Anselmo v. Moniz*, No. 1:25-CV-13309-IT, 2025 WL 3171137 (D. Mass. Nov. 13, 2025);
- 10 • *Ginez Hernandez v. Noem*, No. 1:25-CV-1307, 2025 WL 3170872 (W.D. Mich. Nov. 13, 2025);
- 11 • *Mora Lara v. Noem*, No. 1:25-CV-1332, 2025 WL 3170876 (W.D. Mich. Nov. 13, 2025);
- 12 • *Madrid Gonzalez v. Noem*, No. 1:25-CV-1315, 2025 WL 3170879 (W.D. Mich. Nov. 13, 2025);
- 13 • *Moreira Da Silva v. LaForge*, No. 25CV17095 (EP), 2025 WL 3173859 (D.N.J. Nov. 13, 2025);
- 14 • *Castanon Nava v. DHS*, No. 18-cv-3757 (N.D. Ill. Nov. 13, 2025) (Dkt. 247);
- 15 • *Rodriguez Loredo v. Forestal*, No. 25 C 12758, 2025 WL 3187319 (N.D. Ill. Nov. 14, 2025);
- 16 • *Dionisa Quinonez v. Olson*, No. 25 CV 13524, 2025 WL 3190598 (N.D. Ill. Nov. 14, 2025);
- 17 • *Pu Sacvin v. De Anda-Ybarra*, No. 2:25-CV-01031-KG-JFR, 2025 WL 3187432 (D.N.M. Nov. 14, 2025);
- 18 • *Kashranov v. Jamison*, No. 2:25-CV-05555-JDW, 2025 WL 3188399 (E.D. Pa. Nov. 14, 2025);
- 19 • *Cruz Gutierrez v. Thompson*, No. 4:25-4695, 2025 WL 3187521 (S.D. Tex. Nov. 14, 2025); and,
- 20 • *Morales Chavez v. Dir. Of Detroit Field Office*, No. 4:25-CV-2061, 2025 WL 3187080 (N.D. Ohio Nov. 14, 2025).

20 III. CONCLUSION

21 The Court should grant the Plaintiffs' Motion for a Preliminary Injunction.

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1 Dated: November 17, 2025.

2 **AMERICAN CIVIL LIBERTIES**
3 **UNION OF NEVADA**

4 

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **REPLY IN SUPPORT OF NAMED PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION** with the Clerk of the Court for the United States District Court of Nevada by using the court's CM/ECF system on November 17, 2025. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished on all participants by:

- CM/ECF
- Electronic mail; or
- US Mail or Carrier Service

/s/ Suzanne Lara
An employee of ACLU of Nevada