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13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 Victor Kalid JACOBO RAMIREZ,
 16 Petitioners,
 17 v.
 18 Kristi NOEM et al.,
 19 Respondents.

Case No. 2:25-cv-02136-RFB-MDC

Joint Status Report Regarding Pre-Certification Discovery in Compliance with Court's Order ECF No. 43

20 This joint status report is filed in compliance with the Court's order regarding
 21 status of pre-certification discovery. ECF No. 43. This joint report incorporates the
 22 developments of the last joint status report which was filed on December 10, 2025, with
 23 the most recent developments contained on the last page of this report in bold. ECF No.
 24 48. After written exchanges, revisions and telephone conferences between the parties,
 25 regarding the scope of and language in the protective order, the parties were not able to
 26 agree on the terms of such order, which resulted in motion work. ECF No. 17. On
 27 November 17, 2025, Federal Respondents filed a motion for protective order. ECF No.
 28 25. On November 19, 2025, Defendant John Mattos filed a joinder to the motion for

1 protective order. ECF No. 28. On November 19, 2025, Petitioners filed a response to the
2 motion for protective order. ECF No 30. On November 21, 2025, the Court signed the
3 Protective Order. ECF No. 34. The signing of the protective order was a condition
4 precedent to any pre-certification discovery, including the production of the list of the 185
5 detainees, identified as applicants for admission by DHS and subject to mandatory
6 detention under 8 U.S.C. § 1225(b)(2). Federal Respondents were ready to produce such
7 list within a day or two after the protective order was in place. However due to the few
8 weeks delay in getting a protective order in place, the initial 185 detainees list, was no
9 longer current and needed to be updated to reflect the correct information about the
10 detainees. Since the execution of the protective order on November 21, 2025, Federal
11 Respondents have worked diligently with DHS to get an updated detainees list.

12 On December 1, 2025, Petitioners' counsel requested an update on the status of the
13 detainees list. In that same email, Petitioners' counsel referenced prior discussions from
14 November 6 in which it was represented that the list would be provided within a day after
15 the signing and filing of the protective order. However, that representation was referring to
16 the initial detainees list with the understanding that it would not take weeks to get a
17 protective order in place. On December 3, 2025, Counsel for Federal Respondents
18 informed Petitioners' counsel that she was checking with DHS on whether the initial 185
19 detainees list is current since the execution of the protective order and that an update
20 hopefully would be provided within the next day or two. After an update was not
21 provided, on December 10, 2025, Petitioners' counsel followed up on the status of the
22 updated detainees list, expressed concern that the information had not been provided, and
23 also reminded Federal Respondents that a joint status report was due by 4:00 pm. On the
24 same day, counsel for Federal Respondents was informed by DHS that the individual who
25 compiled the initial detainees list had just returned from an unexpected leave.
26 Accordingly, Federal Respondents notified counsel for Petitioners, that due to an
27 unexpected leave of the individual who compiled the initial detainees' list, an update on
28 the timing of production of such list will occur within the next day or so. For these

1 reasons, the parties respectfully request that the Court sets another deadline to December
2 12, 2025 for the parties to file an updated status report regarding the production of the
3 updated detainees list.

4 **On December 12, 2025, at 11:29, petitioners' counsel sent an email asking for an**
5 **update on the production of the current list of detainees subject to mandatory detention**
6 **under 1225(b)(2). On that same day, at 3:15 pm, Federal Respondents emailed**
7 **petitioners' counsel the current detainees' list.**

8 **Following Petitioners' counsel's review of the list of current § 1225 detainees**
9 **that was provided, Petitioners' counsel raised the following concerns:**

- 10 a. **The information provided does not incorporate all of the information**
11 **that was ordered by the Court;**
- 12 b. **No information was provided on detainees that are not subject to section**
13 **1225 per DHS' standards; i.e., it does not include anyone who was**
14 **identified as being in custody and the court ordered information to be**
15 **provided on a rolling basis; and**
- 16 c. **The information was provided on separate spreadsheets which made it**
17 **difficult to ascertain what information corresponds to which person;**
18 **therefore, Plaintiffs' counsel will need additional time to piece the charts**
19 **together and determine if there are any additional concerns.**

20 **Counsel for Respondents will meet and confer with Petitioners' counsel to**
21 **address these concerns and will provide an updated report to the Court.**

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Dated: December 12, 2025

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Counsel for Plaintiffs

Counsel for Defendants

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