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11 *Listing of counsel continued on the next page*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

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

Case No.: 2:25-cv-02136

17 Plaintiffs-Petitioners,

JOINT STATUS REPORT

18 vs.

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

Defendants-Respondents.

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3 Under Nevada Supreme Court Rule 49.3
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JOINT STATUS REPORT

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2 On December 19, 2025, the Court held a status hearing on precertification discovery. The
3 Court ordered the parties to meet and confer regarding a schedule for Defendants-Respondents to
4 produce documents consistent with the Court's previous orders and file a joint status report by
5 December 30, 2025, which must indicate the positions of the parties if no agreement is reached. ECF
6 No. 59. The undersigned attorneys for Plaintiffs-Petitioners (Plaintiffs' counsel) and the
7 undersigned attorneys for Defendants-Respondents (Defense counsel) hereby submit this Joint
8 Status Report in compliance with the Court's order.

9 During the December 19, 2025, status hearing, Defense counsel indicated that she needed
10 to confer with the DHS representative to determine a timeframe for obtaining the remaining
11 documents. Defense counsel contacted DHS on December 22 and 30, 2025, regarding the time
12 frame needed to obtain information about detainees' bond hearings and outcome of such hearings
13 for detainees who are not subject to final removal orders. However, due to the federal holidays the
14 week of December 22 and December 29, 2025, the parties are still waiting to receive the requested
15 information. As such, the parties respectfully request that the deadline to submit a joint status
16 report with a proposed timeline for producing additional documents related to pre-certification
17 discovery be continued to January 6, 2026.

18 Counsel will meet and confer on January 5, 2026, regarding the status of the above
19 requested information and proposed timelines to submit to the Court.
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1 Dated: December 30, 2025

Dated: December 30, 2025

2 **Counsel for Plaintiffs**

Counsel for Defendants

3 **ACLU OF NEVADA**

TODD BLANCHE

Deputy Attorney General of the
United States

4 */s/ Sadmira Ramic*

SIGAL CHATTAH

5 SADMIRA RAMIC

**First Assistant United States
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6 **UNLV IMMIGRATION CLINIC**

/s/ Virginia Tomova

7 */s/ Michael Kagan*

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