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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,

18 vs.

**PLAINTIFFS'**  
**STATUS REPORT**

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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2 ANDREW ELKINS  
3 GABRIELA RIVERA DORADO  
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17 Michael K.T. Tan (CA SBN# 284869)\*  
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24 mngo@aclu.org

*Counsel for Plaintiffs-Petitioners*

*\*Admitted pro hac vice*

**STATUS REPORT**

1  
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. During the status hearing, Defense counsel indicated that they needed to confer with the  
7 DHS representative to determine a time frame for obtaining the remaining documents.

8 On December 30, 2025, after Plaintiffs' counsel did not receive any information about the  
9 timeline for producing the documents, Plaintiffs' counsel contacted Defense counsel via email and  
10 requested an update. Defense counsel indicated that they reached out to DHS regarding the time  
11 frame needed to obtain information about detainees' bond hearings and outcome of such hearings,  
12 but was still waiting to hear back, and requested that Plaintiffs' counsel draft the joint status report  
13 asking the Court for an extension to file another joint status report by January 5, 2026. Defense  
14 counsel indicated that they anticipate having an update on January 5, 2026. Plaintiffs' counsel  
15 agreed to the additional time but explained that the Court's order on December 19 incorporated  
16 more than information on bond hearings, as referenced in the protective order, ECF No. 34, and  
17 sought clarification on whether DHS has provided a timeline for those documents. Defense counsel  
18 asked for clarification as to what documents were outstanding because in their view, the only  
19 information that had not been produced is related to whether the detainee received a bond hearing  
20 and the outcome of the bond hearing. Plaintiffs' counsel referred to the Court's October 17, 2025,  
21 order referenced in the protective order and provided a list of the documents. Defense counsel  
22 agreed to meet and confer on January 5, 2026, and signed the joint status report, but did not respond  
23 to Plaintiffs' counsel questions about the additional documents that were ordered to be produced.  
24

1 On January 5, 2026, Plaintiffs' counsel called Defense counsel for a meet and confer.  
2 During the meeting, Defense counsel indicated that they could not provide a timeline for producing  
3 the documents and DHS will have a timeline by January 9, 2026. Plaintiffs' counsel asked if DHS  
4 had compiled any of the documents ordered to be produced on a rolling basis by the Court,  
5 including the documents referenced in the protective order, and Defense counsel would only state  
6 that DHS would have a timeline on January 9, 2026, which would include how many hours DHS  
7 needed to gather all the information ordered to be produced for each detainee. A joint status report  
8 was filed on January 6, 2026, reflecting this conversation, ECF No. 66, and the parties agreed to  
9 meet on January 12, 2026, to discuss the timeline and what to include in the subsequent joint status  
10 report.

11 On January 12, 2026, after Defense counsel did not provide an update about the timeline,  
12 Plaintiffs' counsel emailed Defense counsel. Defense counsel replied that DHS provided a timeline  
13 and asked Plaintiffs' counsel to meet and confer via telephone. During the meeting, the following  
14 information was relayed by Defense counsel:

- 15 • DHS needs one month to set up a process for obtaining the documents  
16 referenced in Section 4 of the protective order, ECF No. 34 (copies of any arrest  
17 warrant (Form I-200), Notice to Appear (NTA, Form I-862), Record of Deportable  
18 / Inadmissible Alien (Form I-213), and Notice of Custody Determination issued by  
19 ICE/DHS (Form I-286));
- DHS needs additional time because the information is in a physical A-file and  
20 some of the files are located outside of Nevada;
- The information ordered to be produced can only be obtained from the physical  
21 A-file;
- Once a process is established, DHS can provide the information in Section 4 of  
22 the protective order for the people identified in the lists submitted on 12/22/2025,  
23 12/29/2025, and 1/5/2026 on a rolling basis once per month, *if* their A-file is  
24 physically in Nevada; and
- Documents listed in sections 5-10 in the protective order are in the possession  
of EOIR, not DHS, and therefore Defense counsel will need additional time to  
identify a point of contact at EOIR to obtain the information.

1 Plaintiffs' counsel expressed concern that DHS needed an additional month to identify a  
2 process despite being aware of the Court's order in October and repeated discussions between the  
3 parties about the discovery. DHS has not provided sufficient information to ascertain a reasonable  
4 timeline for production, and DHS could not provide information on how many A-files are outside  
5 of Nevada, why that information cannot be obtained electronically either from DHS or from the  
6 Department of Justice for documents that are filed in Immigration Court, or how many documents  
7 would be provided monthly. Defense counsel agreed to reach out to DHS to get more concrete  
8 information for the timeline and EOIR to ascertain a timeline for the documents DHS stated was  
9 not in its possession. The parties agreed to meet on January 20, 2026, to discuss the information  
10 to be obtained by Defense counsel, and if at that time they could not agree on a timeline, they  
11 would submit proposed competing timelines for the Court. This information was included in the  
12 joint status report filed on January 12, 2026. ECF No. 68.

13 On January 20, 2026, Plaintiffs' counsel emailed Defense counsel about the matters  
14 discussed during the January 12, 2026, meeting. On the morning of January 21, 2026, after not  
15 receiving a response from Defense counsel, Plaintiffs' counsel again emailed Defense counsel. On  
16 the evening of January 22, 2026, Defense counsel emailed Plaintiffs' counsel to request their  
17 availability for a meeting that evening or the following day, and Plaintiffs' counsel responded  
18 shortly after providing proposed dates and times. As of the filing of this status report, Plaintiffs'  
19 counsel has not received a response from Defense counsel.

20 Based upon Defense counsel's failure to respond, provide a timeline as agreed upon, and  
21 communicate why there are continued delays in providing the information, and the lack of  
22 information provided by DHS to ascertain a timeline for producing the documents ordered by this  
23 Court, the lapse of over three months since this Court ordered the Defendants to produce the  
24 documents, and this Court's multiple orders for Defendants to continue to exercise diligence in

1 gathering the information ordered by the Court, *see e.g.* ECF No. 23, Plaintiffs respectfully propose  
2 the following timeline for producing all documents outlined in the protective order: February 6,  
3 2026, for all detainees identified in the lists produced on December 22, 2025, December 29, 2025,  
4 January 5, 2026, and January 12, 2026; and February 13, 2026, for all detainees identified  
5 thereafter, including in the January 20, 2026, list.

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1 Dated: January 23, 2026.

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

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*Counsel for Plaintiffs-Petitioners*

\*Admitted pro hac vice

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I electronically filed the foregoing **PLAINTIFFS' STATUS**  
3 **REPORT** with the Clerk of the Court for the United States District Court of Nevada by using the  
4 court's CM/ECF system on January 23, 2026. I further certify that all participants in the case are  
5 registered CM/ECF users and that service will be accomplished on all participants by:

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

9 *Suzanne Lara*  
10 ACCU of Nevada Employee