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12 *Attorneys for the Federal Respondents*

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  
**Federal Respondents' Status Report**

20 Federal Respondents submit this Status Report in response to Plaintiffs' Status  
 21 Report (ECF No. 69) and consistent with the parties' Joint Status Report filed on January  
 22 12, 2026 (ECF No. 68).

23 **A. DHS Production Schedule**

24 As explained in the parties' Joint Status Report, DHS advised that documents  
 25 encompassed by the fourth category of the Protective Order—copies of Forms I-200, I-  
 26 213, I-286, Notices to Appear, and related custody records—must be manually retrieved,  
 27 reviewed, and scanned from physical A-files, many of which are not centrally located and  
 28 may be housed outside the District of Nevada. DHS further advised that it required

1 approximately one month from January 12, 2026, to establish a process for this manual  
2 collection effort and would thereafter proceed with production on a rolling basis. *See* ECF  
3 No. 68. DHS indicated that it intends to proceed in a phased manner, beginning with  
4 detainees identified on the December 22, December 29, and January 5 detainee lists  
5 whose A-files are currently located within the District of Nevada. DHS would then  
6 proceed to locate and produce the applicable documents for detainees who may no longer  
7 be in the District of Nevada or whose A-files are not located within this District. DHS  
8 explained that these materials are maintained in physical A-files, which may be located in  
9 multiple locations—including other areas of responsibility or at the National Records  
10 Center—and that the timing of production will depend on the location and retrievability of  
11 those files.

12 Consistent with that framework, Federal Respondents propose the following  
13 production schedule:

- 14 1. **First production:** on or before February 16, 2026, for detainees identified in the  
15 December 22, December 29, and January 5 detainee lists whose A-files are  
16 currently located within the District of Nevada.
- 17 2. **Second production:** on or before March 16, 2026, continuing production for  
18 additional detainees, including those whose A-files are not located within the  
19 District of Nevada, as files are retrieved and processed.
- 20 3. **Third production:** on or before April 16, 2026, continuing production  
21 consistent with the same framework.

22 DHS will continue producing responsive materials on a rolling basis thereafter,  
23 consistent with the process and sequencing described in ECF No. 68, with the intent to  
24 fulfill its obligations under pre-certification discovery, until the Court reaches a  
25 determination regarding class certification or otherwise orders.

#### 26 **B. EOIR-Related Materials**

27 With respect to documents encompassed by the fifth through tenth categories of the  
28 Protective Order, Federal Respondents reiterate that these materials are maintained by the

1 Executive Office for Immigration Review (“EOIR”), not DHS. As noted in the Joint  
2 Status Report, Federal Respondents are currently engaged in internal coordination efforts  
3 to determine the appropriate EOIR points of contact and to assess a feasible timeline for  
4 addressing these materials. Federal Respondents will provide the Court with an update  
5 regarding EOIR-related materials once additional information becomes available.

6 **C. Requested Volume Estimates and Identification of A-Numbers**

7 Plaintiffs request greater specificity regarding anticipated document volumes,  
8 identification of A-files physically located outside of Nevada, and projected production  
9 quantities. At this stage, that information cannot be reliably determined.

10 As explained in the Joint Status Report, DHS’s production requires manual  
11 retrieval and review of physical A-files, many of which are not centrally located and may  
12 be housed outside the District of Nevada. Until individual A-files are physically retrieved  
13 and reviewed, DHS cannot ascertain the contents of those files, including the number of  
14 responsive documents or the specific A-numbers that may be implicated in any given  
15 production batch.

16 Providing estimates regarding document volume, number of documents to be  
17 produced per batch, or identifying the specific number of A-files available at any given  
18 storage location at this juncture would require speculation, which Federal Respondents  
19 seek to avoid. Federal Respondents will continue producing responsive materials on a  
20 rolling basis consistent with the schedule outlined above, as files are retrieved and  
21 reviewed.

22 **D. Conclusion**

23 Federal Respondents respectfully submit that the proposed schedule is consistent  
24 with the parties’ prior representations to the Court, reflects the logistical realities of DHS’s  
25 production obligations, and provides a reasonable framework for ongoing, rolling  
26 production while the case proceeds.

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1 Respectfully submitted this 23rd day of January 2026.

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