

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA

M.C.H.L.,)	
)	
Petitioner,)	
)	
vs.)	CASE NO.:
)	4:25-CV-00329-WMR
)	
DARREN PIERCE, <i>in his official capacity as</i>)	
<i>Sheriff of Whitfield County Jail; and</i>)	
LADEON FRANCIS, <i>ICE Atlanta</i>)	
<i>Field Office Director; and</i>)	
TODD LYONS, <i>in his official capacity as Acting</i>)	
<i>Director of Immigration and Customs</i>)	
<i>Enforcement; and</i>)	
KRISTI NOEM, <i>Secretary of Homeland Security</i>))	
And PAMELA BONDI, <i>U.S. Attorney General.</i>)	
)	
Respondents.)	
_____)	

NOTICE OF SUPPLEMENTAL AUTHORITIES

Undersigned counsel has just learned of additional authorities from a class action in California, in which Petitioner is a member, overturning the BIA’s *Matter of Yajure Hurtado* nationwide, determining that 8 U.S.C. § 1225(b)(2) does not apply for people in Petitioner’s situation who were apprehended in the interior. See *Maldonado Bautista et al v. Ernesto Santacruz Jr et al*, No. Case 5:25-cv-01873-SSS-BFM (C.D. CA. Nov. 25, 2025), attached hereto.

Based on the above-mentioned class action, the Court can issue outright release forthwith in Petitioner's case instead of waiting on undersigned counsel to return from her trip abroad and file a more detailed response. It is undersigned counsel's hope that the Court can just grant outright release instead of needlessly keeping Petitioner needlessly detained for several more days throughout the Thanksgiving holiday until full briefing can be completed.

This 26th day of November, 2025

/s/ Karen Weinstock
Karen Weinstock
Attorney for Petitioner
Weinstock Immigration Lawyers, P.C.
1827 Independence Square
Atlanta, GA 30338
Phone: (770) 913-0800
Fax: (770) 913-0888
kweinstock@visa-pros.com

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CERTIFICATE OF COMPLIANCE

I hereby certify, pursuant to Local Rules 5.1 and 7.1(D), that the filing(s) filed herewith have been prepared using Century Schoolbook, 13 point font.

/s/ Karen Weinstock
Karen Weinstock
Attorney for Petitioner
Weinstock Immigration Lawyers, P.C.
1827 Independence Square
Atlanta, GA 30338
Phone: (770) 913-0800
Fax: (770) 913-0888
kweinstock@visa-pros.com

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of November, 2025, this document was served, via electronic delivery to Respondents' counsel via CM/ECF system which will forward copies to Counsel of Record.

/s/ Karen Weinstock
Karen Weinstock
Attorney for Petitioner
Weinstock Immigration Lawyers, P.C.
1827 Independence Square
Atlanta, GA 30338
Phone: (770) 913-0800
Fax: (770) 913-0888
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