

United States District Court  
Western District of Texas  
El Paso Division

Seamus Thomas Culleton,  
Petitioner,

v.

Mary De Anda-Ybarra, Field Office Director,  
Enforcement and Removal, U.S. Immigration  
and Customs Enforcement, *et. al.*

Respondents.

No. 3:25-cv-00554-KC

**RESPONDENTS ADVISORY TO THE COURT REGARDING EXHIBITS FOR  
JANUARY 16, 2026 HEARING**

Respondents hereby file this Notice of the Exhibits that it will use for the January 16, 2026

Hearing:

Exhibit A: VWP Notice of Intent to Issue a Final Administrative Order

Exhibit B: Notice of Entry of Appearance and Application to Register Permanent Resident

Exhibit C: Culleton Passport

Exhibit D: Notice of Custody Determination and Notice to Arrested or Detained Foreign  
Nationals

Exhibit E: Business Record Affidavit

Exhibit F: Bond Redetermination Request

Exhibit G: Government's Motion to Reconsider to BIA

Additionally, Respondents will be relying on the documents produced in its Response to  
Petitioner's Writ of Habeas Corpus

Dated: January 14, 2025

Respectfully submitted,

Justin R. Simmons  
United States Attorney

*/s/ Adrian Acosta*

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