

UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

LUIS GUILLERMO LALA INAMAGUA,

Petitioner,

-against-

GREG HALE, IN HIS OFFICIAL CAPACITY AS SUPERINTENDENT OF NORTHWEST STATE CORRECTIONAL FACILITY, PATRICIA HYDE, IN HER OFFICIAL CAPACITY AS ACTING BOSTON FIELD OFFICE DIRECTOR, IMMIGRATION AND CUSTOMS ENFORCEMENT, ENFORCEMENT AND REMOVAL OPERATIONS; VERMONT SUB-OFFICE DIRECTOR OF IMMIGRATION AND CUSTOMS ENFORCEMENT, ENFORCEMENT AND REMOVAL OPERATIONS; TODD M. LYONS, IN HIS OFFICIAL CAPACITY AS ACTING DIRECTOR, U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; KRISTI NOEM, IN HER OFFICIAL CAPACITY AS SECRETARY OF THE UNITED STATES DEPARTMENT OF HOMELAND SECURITY; MARCO RUBIO, IN HIS OFFICIAL CAPACITY AS SECRETARY OF STATE; AND PAMELA BONDI, IN HER OFFICIAL CAPACITY AS U.S. ATTORNEY GENERAL,

Docket No. 2:25-cv-892

**COUNSEL FOR PETITIONER'S RESPONSE TO RESPONDENT GREG HALE'S
STATUS REPORT ON ATTORNEY VISITATION**

Counsel for Petitioner acknowledges that the Department of Corrections has represented to her that her visiting privileges have been restored, and that she may now access the facility. On Monday, November 24, 2025, at around 3:00 p.m., counsel was still refused access to her clients, but since then has been informed by email that her visiting privileges have been restored.

Counsel maintains that the ambiguity in the Department's Policy 327.01, contributed to the Department's allegation of a violation of protocol. The attached policy is silent about protocols for when a visitor, who may be subject to "Regular Social Visits" under Section 1 in some instances, is involved in a role that can be classified under Section 4's "Non-routine Visits." Attachment 1, DOC Policy 327.01. Moreover, the Department failed to follow its own policy on "Denial or Termination of Visits" and "Suspension of Visiting Privileges" by failing to provide counsel with a written notice as outlined in Section 6(d). Attachment 1, at 9.

Finally, counsel continues to be concerned by the department's apparent assertion that they may not have to disclose all security protocols publicly. Attachment 2. Counsel is concerned that additional security protocols could be unknowingly violated, which could result in another bar from entry, and subsequent constitutional violations for detained clients.

Dated: November 26, 2025, at Burlington, Vermont.

A handwritten signature in cursive script that reads "Kristen J. E. Connors". The signature is written in black ink and is positioned above a horizontal line.

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