

1 Keli M. Reynolds (CA SBN 227650)\*  
2 Olmos and Reynolds Law Group, LLP  
3 315 West 9th Street, Suite 801  
4 Los Angeles, CA 90015  
5 TEL (323) 951-0144  
6 FAX (323) 940-4406  
7 keli@olmosandreynolds.com  
8 \*Pro Hac Vice application pending

9 Sabrina Damast (CA SBN #305710 and NY SBN #5005251)  
10 Law Office of Sabrina Damast, Inc.  
11 510 West 6th Street, Suite 330  
12 Los Angeles, CA 90014  
13 Telephone: (323) 475-8716  
14 Emails: sabrina@sabrinadamast.com

15 *Counsels for*  
16 Kevin Alexander Polanco Retana

17 **UNITED STATES DISTRICT COURT**  
18 **FOR THE DISTRICT OF ARIZONA**

19 KEVIN ALEXANDER POLANCO  
20 RETANA,

21 Petitioner,

22 vs.

23 PAMELA BONDI, in her official capacity  
24 as Attorney General; KRISTI NOEM, in her  
25 official capacity as Secretary of the  
26 Department of Homeland Security; TODD  
27 M. LYONS, in his official capacity as  
28 Current Acting Director of Immigration and  
Customs Enforcement; JOHN E. CANTU,  
in his official capacity as Phoenix ICE Field  
Office Director; WARDEN, Florence  
Service Processing Center.

Respondents

Case No.: CV-25-04370-PHX-KML (JZB)

**STATUS UPDATE**

1 Pursuant to the Court's Order issued November 24, 2025 (ECF No. 8), counsel for  
2 Petitioner submits this status report regarding correspondence with government  
3 representatives after issuance of the Temporary Restraining Order ("TRO") at 11:40pm  
4 on Saturday, November 22, 2025:

5 1. At 6:38pm, approximately three hours before filing the Application for TRO,  
6 I emailed Assistant U.S. Attorney Theo Nickerson to inform her that I would be filing the  
7 emergency ex parte Application for TRO. I filed the TRO application using the Court's  
8 After-Hours Emergency Injunctive Relief Pilot Program at approximately 9:45pm.

9 2. At 11:40pm, the Court issued the TRO without notice, instructing, *inter alia*,  
10 that counsel for Petitioner email a copy of the order to four individuals at the U.S.  
11 Attorney's Office.

12 3. On November 23, 2025 at 12:22am, undersigned counsel emailed a copy of  
13 the TRO to the individuals instructed. Counsel also included the documents now docketed  
14 at ECF Nos. 1-4.

15 4. At approximately the same time, undersigned counsel emailed a copy of the  
16 TRO to various emails for ICE in Adelanto, CA, and in Phoenix, AZ.

17 5. On November 23, 2025 undersigned counsel sent an email to additional  
18 individuals at the Florence Service Processing Center, again informing ICE of the TRO.

19 6. On November 23, 2025 at 1:39pm, Ms. Nickerson emailed undersigned  
20 counsel asking where Petitioner was detained so that she could communicate the TRO to  
21 ICE. Counsel responded with the information.

22 7. On November 24, 2025, Assistant Field Office Director Alexis Garcia  
23 informed counsel that my client was not removed and would be returned to Adelanto, CA.  
24 An unnamed individual from Adelanto Detention Center informed counsel that Petitioner  
25 was scheduled for removal to Mexico, but because of the order, Petitioner would be  
26 transferred back to Adelanto, CA.

1           8.     Also on November 24, 2025, undersigned counsel and her paralegal also  
2 spoke with various representatives from the Mexican Consulate to see if they would  
3 confirm acceptance of Petitioner's removal to Mexico. One representative informed  
4 counsel that removals of non-citizens of Mexico has been halted pending further order due  
5 to protests in Mexico, but that such removals may resume on Wednesday, November 26.  
6 In a later call, a Mexican Consular Officer informed counsel's paralegal that Petitioner's  
7 name does not appear on the list of individuals who will be removed.

8           9.     Undersigned counsel has left messages at Florence Service Processing  
9 Center for Petitioner to call her, as that is the only method by which counsel can contact  
10 Petitioner. Petitioner has not yet called undersigned counsel. Undersigned counsel does  
11 not know how long it takes for such messages to be communicated to a detainee.

12           10.    Ms. Ordonez informed counsel today that Petitioner was able to call her and  
13 informed her that ICE officers had again told him that they are looking for a flight to send  
14 him to El Salvador because Mexico is not accepting his removal there.

15  
16 Dated: November 24, 2025

Respectfully Submitted,

/s/ Keli M. Reynolds

Keli M. Reynolds  
Attorney for Petitioner