

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

BASILIO TITONE PIE,)
Petitioner,)
v.) Case No. 25-CV-1564
KRISTI NOEM, Secretary, U.S. Department of)
Homeland Security; et al.)
Respondents.)

**PETITIONER'S MOTION
TO PROVIDE SUPPLEMENTAL AUTHORITY TO
THE PETITION FOR WRIT OF HABEAS CORPUS**

The Petitioner, BASILIO TITONE PIE, by and through his own and proper person and through his attorneys, BRITTNI RIVERA, of KRIEZELMAN BURTON & ASSOCIATES, LLC, files this Motion to Provide Supplemental Authority to the Amended Petition for Writ of Habeas Corpus in light of recent case law which directly affects and impacts Petitioner's case. On November 25, 2025, the District Court in the Central District of California, Judge Sunshine S. Sykes, issued a decision certifying a nationwide class of individuals who are bond eligible and claim that the DHS policy denying bond violates the INA and Due Process. In the case of *Lazaro Maldonado Bautista et al v. Ernesto Santacruz, et al, 25- cv- 01873*, Central District Court, California, November 25, 2025), the district court entered the following order: **“ORDER GRANTING PLAINTIFF PETITIONER'S MOTION FOR CLASS CERTIFICATION”** [DKT. NO. 41]. See Exhibit A. This order was preceded by the court's order on November 20, 2025, in which the same court issued an order in the case granting the petitioners' **“MOTION FOR**

PARTIAL SUMMARY JUDGMENT AND DENYING REQUEST FOR FINAL JUDGMENT.” [DKT. NO. 42]. See Exhibit B.

The district court specifically certified the class as follows:

The Bond Eligible Class is CERTIFIED as to Petitioners’ claims that the DHS Policy violates the INA and Due Process. The class certified is defined as follows:

- Bond Eligible Class: All noncitizens in the United States without lawful status who (1) have entered or will enter the United States without inspection; (2) were not or will not be apprehended upon arrival; and (3) are not or will not be subject to detention under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231 at the time the Department of Homeland Security makes an initial custody determination.

Under the facts and circumstances of Petitioner’s case, we believe that the case directly applies to the Petitioner’s case and seek leave of the court to supplement the record.

Respectfully Submitted,

/s/ Brittni Rivera
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