

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF OKLAHOMA**

TRUNG HUY HUU NGUYEN,)	
)	
Petitioner,)	
)	
v.)	CIV-25-1415-JD
)	
PAMELA BONDI, et al.,)	
)	
Respondents.)	

RESPONDENTS' MOTION TO SUPPLEMENT THE RESPONSE

Respondents move to supplement their Response (Doc. 11) to the Petition (Doc. 1) with a supplemental declaration (Exhibit 1). The short supplemental declaration includes information inadvertently omitted from Detention Officer Castillo's prior declaration that is relevant to Petitioner's claim of procedural noncompliance. Respondents apologize to the Court and Petitioner for the failure to include the information in the Response and do not seek to add additional argument as a result. However, Respondents contend that the supplemental information will assist the Court in its review of the Petition.

The undersigned was provided the supplemental declaration in the late afternoon of December 16, 2025. On the next morning, today, the undersigned emailed counsel for Petitioner to determine Petitioner's position on this motion. Petitioner's counsel has not yet responded—and in fairness did not have much time to do so prior to this filing. However, given the accelerated timeframe for habeas matters, this motion is being filed without additional delay.

Accordingly, Respondents respectfully request that the Court permit the supplementation of Respondents' Response to the Petition (Doc. 11) with the Supplemental Declaration of Martin Castillo attached as Exhibit 1.

Dated: December 17, 2025

Respectfully submitted,
ROBERT J. TROESTER
United States Attorney

/s/ Scott Maule
Scott Maule (OBA 31760)
Assistant U.S. Attorney
United States Attorney's Office
Western District of Oklahoma
210 Park Avenue, Suite 400
Oklahoma City, OK 73102
(405) 553-8832/8700
scott.maule@usdoj.gov