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8 *Attorneys for the Federal Respondents*

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 10 **UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

11 Jesus Verdugo-Carrasco,
 12
 Petitioner,
 13
 v.

Case No. 2:25-cv-02374-CDS-BNW

**Federal Respondents' Supplemental
 Briefing**

14 THE UNITED STATES OF AMERICA,
 KRISTI NOEM, in her Official Capacity,
 15 Secretary of the United States Department of
 Homeland Security; PAMELA BONDI, in
 16 her Official Capacity, Attorney General,
 Department of Justice; KERRI ANN
 17 QUIHUIS, in her Official Capacity, ICE
 Field Office Director, Detention and
 18 Removal, Las Vegas, Nevada (ICE Local);
 MICHAEL BERNACKE, in his Official
 19 Capacity, Field Office Director, Salt Lake
 City Field Office, U.S. Immigration and
 20 Customs Enforcement; TODD LYONS, in
 his Official Capacity, Acting Director,
 21 Immigration & Customs Enforcement;
 JOHN MATTOS, in his Official Capacity,
 22 Warden of Immigration Detention Facility,
 Nevada Southern Detention Center,
 23
 Respondents.
 24

25 Federal Respondents hereby file their Supplemental Briefing. This Supplemental
 26 Briefing is filed pursuant to the Court Hearing that was conducted on January 27, 2026,
 27 where the Court ordered Federal Respondents to file supplemental information in the form
 28 of a declaration or an affidavit. The Declaration of Tyler Adams, Supervisory Detention

1 and Deportation Officer (SDDO) with the U.S. Department of Homeland Security (DHS),
2 Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations
3 (ERO) is attached hereto as Exhibit A.

4 Respectfully submitted this 29th day of January 2026.

5 TODD BLANCHE
6 Deputy Attorney General of the United States
7 SIGAL CHATTAH
8 First Assistant United States Attorney

9 /s/ Tamer B. Botros
10 TAMER B. BOTROS
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