

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

CHANDA ROEUN,

Petitioner,

v.

Civil Action No. 3:25-CV-03361-E

WARDEN of the Prairieland Detention Center;  
JOSHUA JOHNSON, Acting Dallas Field  
Office Director of ICE; TODD LYONS, Acting  
Director of U.S. Immigration and Customs  
Enforcement; KRISTI NOEM, Secretary of the  
U.S. Department of Homeland Security; and  
PAMELA BONDI, Attorney General of the  
United States,

Respondents.

**PETITIONER'S SECOND SUPPLEMENT TO (1) PETITION FOR WRIT OF HABEAS  
CORPUS AND (2) EMERGENCY MOTION FOR TEMPORARY RESTRAINING  
ORDER AND PRELIMINARY INJUNCTION**

Petitioner CHANDA ROEUN ("Roeun" or "Petitioner"), by and through undersigned counsel, files this Second Supplement to (1) Petition for Writ of Habeas Corpus and (2) Emergency Motion for Temporary Restraining Order and Preliminary Injunction.

**I. SUPPLEMENTAL INFORMATION**

1. As Petitioner previously mentioned in his Petition for Writ of Habeas Corpus (ECF No. 1), Emergency Motion for Temporary Restraining Order (ECF No. 2), and Supplemental Memorandum in Support for Temporary Restraining Order and Preliminary Injunction (ECF No. 8), Petitioner initiated steps to vacate his 1999 criminal conviction, which served as the basis for his immigration removal proceedings. More specifically, on or about November 5, 2025, Petitioner filed a Motion to Vacate his California Penal Code §211 (Robbery), §245(a)(2) (Assault

with a Firearm), and §136.1(b)(1) (Dissuading a Witness) conviction before the Superior Court of the State California in Los Angeles County (the “LA Court”). Petitioner’s motion argued that said conviction suffered from an underlying constitutional defect—namely, that he was deprived of the ability to meaningfully understand and knowingly accept the life-altering consequences of his plea, resulting in his conviction, by his attorney’s ineffective assistance of counsel. *See* Ex. A, a true and correct copy of the Motion to Vacate.

2. Yesterday, on or about January 7, 2025, the LA Court held a hearing on the Motion to Vacate and ultimately ruled to dismiss Petitioner’s criminal conviction. While Petitioner has requested a certified copy of the LA Court’s order from the LA Court pursuant to Federal Rule of Evidence 1005, which he will file in this Court as soon as he is able to receive a copy, Petitioner requests that this Court take judicial notice of this ruling pursuant to Federal Rule of Evidence 201. In further support, Petitioner will supplement with additional evidence as necessary, and also attaches a true and correct copy of the case history and information from the LA Court’s website as Ex. B hereto.

3. The fact that Petitioner’s criminal conviction has been dismissed, the entire basis of Petitioner’s immigration removal proceeding is no longer valid. Without any criminal conviction, Petitioner is now free to move the immigration court to reopen and terminate his removal proceedings. Granting of this motion will result in a reinstatement of Petitioner’s lawful permanent resident status—a status that should have never been revoked in the first place, much less should Petitioner have been placed on an order of supervision, which was only recently revoked giving rise to his re-detainment and this litigation.

## II. PRAYER

Accordingly, and as mentioned throughout his filings, Petitioner's compelling and time-sensitive situation exceeds the minimum standard for obtaining habeas corpus and injunctive relief in order to be returned to his family and home in California. For these additional reasons, this Court should grant Petitioner's Petition for Writ of Habeas Corpus and Emergency Motion and Memorandum in Support for Temporary Restraining Order and Preliminary Injunction.

Respectfully submitted,

By: /s/ Tracy L. McCreight  
Tracy L. McCreight  
State Bar No. 24037064  
Email: [TMcCreight@duanemorris.com](mailto:TMcCreight@duanemorris.com)  
Brittany Murphree  
State Bar No. 24137998  
Email: [BMurphree@duanemorris.com](mailto:BMurphree@duanemorris.com)  
DUANE MORRIS LLP  
Terrace 7, 2801 Via Fortuna  
Suite 200  
Austin, TX 78746-5435  
Telephone: 512.277.2300  
Fax: 512.277.2301

Kristin M. Burns  
State Bar No. 24036338  
Email: [KMBurns@duanemorris.com](mailto:KMBurns@duanemorris.com)  
DUANE MORRIS LLP  
200 Crescent Court, Suite 900  
Dallas, TX 75201  
Telephone: 214.257.7200  
Fax: 214.257.7201

Bryna Bolt (CA SBN 339378)  
[bbolt@immdef.org](mailto:bbolt@immdef.org)  
IMMIGRANT DEFENDERS LAW CENTER  
634 S. Spring Street, 10th Floor  
Los Angeles, CA 90014  
Telephone: (213) 340-6583

*Attorneys for Petitioner Chanda Roeun*

**CERTIFICATE OF SERVICE**

On January 8, 2026, I electronically submitted the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court.

/s/ Tracy L. McCreight

Tracy L. McCreight