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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

**MARIA GUADALUPE RODRÍGUEZ
RAMÍREZ,**

Petitioner,

vs.

**DAVID MARIN, DIRECTOR OF LOS
ANGELES FIELD OFFICE, U.S.
IMMIGRATION AND CUSTOMS
ENFORCEMENT;**

**KRISTI NOEM, SECRETARY OF THE U.S.
DEPARTMENT OF HOMELAND SECURITY;
AND**

**PAM BONDI, ATTORNEY GENERAL OF
THE UNITED STATES,**

IN THEIR OFFICIAL CAPACITIES,

Respondents

**NOTICE OF UPDATED CASE STATUS
AND COMPLIANCE CONCERNS**

Case No. 5:25-cv-3336

1 **NOTICE OF GOVERNMENT NON-COMPLIANCE AND UPDATED CASE STATUS**

2 1. Petitioner MARIA GUADALUPE RODRÍGUEZ RAMÍREZ, by and through
3 undersigned counsel, respectfully submits this Notice to apprise the Court of material
4 developments since the Court issued its Order enjoining Respondents from removing or
5 transferring Petitioner and directing Respondents to file a response by close of business today.

6 **Background**

7 2. On December 10, 2025, Petitioner appeared voluntarily for a scheduled USCIS
8 adjustment-of-status interview. Rather than conducting the interview, at approximately 12 PM,
9 DHS officers abruptly detained Petitioner without affording her any opportunity to consult with
10 counsel, to speak privately with her family, or to meaningfully understand or contest the basis for
11 her detention.

12 3. Neither Petitioner nor her son nor her interpreter was permitted to review any
13 purported order, document, or legal authority allegedly justifying her detention. DHS officers
14 provided no explanation in a manner that ensured Petitioner—who was removed from her
15 interpreter mid-process—understood what was happening or could meaningfully respond.
16 Instead, DHS informed Petitioner’s family that she would be deported at approximately 5:30 PM
17 that same day. Faced with imminent and irreversible harm, Petitioner filed an Emergency
18 Petition for Writ of Habeas Corpus and Ex Parte Motion for Temporary Restraining Order
19 seeking to prevent her imminent removal (ECF. No. 1), which was filed at approximately 4:30
20 PM.

21 4. The next morning, on December 11, 2025, the Court issued an Order enjoining
22 Respondents from deporting or transferring Petitioner and directing Respondents to file a
23 response by close of business today.

24 **Updated Facts Regarding Petitioner’s Removal and Custody Status**

25 5. Following the filing of Petitioner’s emergency papers, Petitioner’s family
26 received information indicating that Petitioner had already been transported to Tijuana, Mexico
27 earlier that same day. According to Petitioner’s son, DHS personnel had initially stated that
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1 removal would occur at approximately 5:30 PM, but the family subsequently learned that
2 Petitioner had been taken across the border before any opportunity for judicial review or
3 meaningful consultation with counsel, almost immediately following her detention.

4 6. In other words, DHS appears to have effectuated Petitioner's removal in total
5 secrecy: without notice, without disclosure of any lawful basis, without affording Petitioner
6 access to counsel, and without allowing her family or interpreter to review or even identify the
7 purported order underlying DHS's actions. To date, Respondents have provided no confirmation
8 of Petitioner's custody status, no documentation supporting removal, and no explanation of how
9 their actions comport with the Court's Order.

10 7. At present, Petitioner's precise status, location, and the circumstances surrounding
11 her removal remain opaque.

12 8. To date, Respondents have not disputed that Petitioner was removed on December
13 10, nor have they provided any documentation reflecting the timing or legal basis of that
14 removal.

15 **Preservation of Jurisdiction and Requested Relief**

16 9. Petitioner submits this Notice to ensure the Court is fully apprised of these
17 extraordinary developments. Whether Petitioner was removed immediately before or in disregard
18 of the Court's Order, Respondents' conduct raises grave concerns regarding transparency,
19 compliance, and the ability of this Court to meaningfully review executive detention and removal
20 actions.

21 10. Petitioner respectfully submits that the Court retains jurisdiction to determine
22 compliance with its Order, to require Respondents to account for Petitioner's status and
23 whereabouts, and to order appropriate relief necessary to address the consequences of
24 Respondents' actions, including restoration of the status quo ante if warranted. Petitioner further
25 respectfully requests that the Court direct Respondents to immediately clarify Petitioner's
26 custody status, the timing and legal basis of any removal, and their compliance with the Court's
27 injunction.

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1 DATED: December 12, 2025

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Respectfully Submitted,

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_____/s/_____
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