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BAT A. UNG

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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **EASTERN DIVISION**

11 BAT A. UNG,
12 Petitioner,
13 v.
14 KRISTI NOEM, et. al.,
15 Respondent.

Case No.: 5:25-cv-03349-SVW-ADS


**SUPPLEMENTAL DECLARATION OF
BAT A. UNG IN SUPPORT OF
APPLICATION FOR TEMPORARY
RESTRAINING ORDER**

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1 **SUPPLEMENTAL DECLARATION OF BAT A. UNG**

2 I, Bat A. Ung, declare:

3 1. I, Bat A. Ung, am the petitioner in this action.

4 2. I am currently detained by Immigration and Customs Enforcement (ICE)
5 at the Adelanto Detention Facility in Adelanto, California. My A number is A 

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7 3. I provided an initial declaration in connection with my Petition for Writ of
8 Habeas Corpus, which was filed on December 11, 2025. My current immigration
9 detention began on October 16, 2025, and I have been continuously detained since that
10 date. I provide this supplemental declaration regarding events occurring after December
11 11, 2025.

12 4. I understand that a Deportation Officer filed a declaration in this action
13 that states that “[o]n or about October 17, 2025, the Vietnam consulate was notified of
14 [my] detention and on or about October 31, 2025, [my] travel documents were
15 requested.” However, I was not provided a meeting with a consular officer until
16 January 13, 2026.

17 5. On January 13, 2026 at 5:00 am, I met with a consular officer from
18 Vietnam by video call from the detention facility in Adelanto, California. The consular
19 officer began by speaking with me in Vietnamese, but I explained that I only speak
20 Cantonese and English. An English interpreter was then provided, and I truthfully
21 answered all of the officer’s questions. I told the consular officer that both of my
22 parents were Chinese, that I was born in Saigon, and that I lived in Saigon until 1975. I
23 truthfully explained that the only documentation I have that shows my connection to
24 Vietnam is the paperwork regarding the United States granting me Lawful Permanent
25 Resident status after my immigration from Vietnam. I truthfully explained that I have
26 no relatives in Vietnam and do not know anyone there. At the conclusion of this
27 conversation, the consular officer told me that he does not think I’m Vietnamese.
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1 6. During my current detention, I received the attached notice stating that my
2 ICE custody status would be reviewed on or about January 15, 2026. However, I still
3 have not had a meeting with ICE regarding my custody status, and have not received
4 any information about the results of any custody status review.

5 7. On January 14 and 20, 2026, I spoke with Deputy Federal Public Defender
6 Katherine Farkas. I gave her the information contained in this declaration. She read this
7 declaration to me over the phone. I authorized her to sign it on my behalf.

8 I declare under penalty of perjury under the laws of the United States that the
9 foregoing is true and correct.

10 Executed on January 20, 2026, in Los Angeles, California.

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13 Date: 1/20/2026

Bat A. Ung (by Katherine Farkas)
Katherine Farkas

BAT A. UNG