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6
7 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
8

9 Jordan RAMIREZ QUINTANA

Case No. 1:25-cv-00919-SJD

10 Petitioner,

11 v.

12 Robert LYNCH, Field Office Director of
Enforcement and Removal Operations, Detroit
Field Office, Immigration and Customs
13 Enforcement; Kristi NOEM, Secretary, U.S.
Department of Homeland Security; U.S.
14 DEPARTMENT OF HOMELAND
SECURITY; Todd LYONS, Acting Director of
15 U.S. Immigration and Customs Enforcement;
Pamela BONDI, U.S. Attorney General;
16 EXECUTIVE OFFICE FOR IMMIGRATION
REVIEW; Richard JONES, Warden of Butler
17 County Jail.

18 Respondents.
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**NOTICE OF SUPPLEMENTAL
AUTHORITY**

1 1. Petitioner Jordan Ramirez Quintana respectfully notifies the Court of a dispositive
2 legal development. On December 18, 2025, the U.S. District Court for the Central District of
3 California entered Final Judgment in the nationwide class action *Maldonado Bautista v. Santacruz*,
4 No. 5:25-CV-01873-SSS-BFM (C.D. Cal.).

5 2. A copy of the Court's Final Judgment and Order is attached with this Notice.

6 3. This Final Judgment is critical to the instant Petition for three reasons.

7 4. First, the Court rejected the Government's argument that the class certification was
8 merely interlocutory. It entered Final Judgment on Counts I-III, certifying the class and declaring
9 the policy unlawful. As a class member, Petitioner's rights are now adjudicated, and the
10 Government is collaterally estopped from relitigating their detention status.

11 5. Second, the Judgment confirms the futility of exhausting the Petitioner's rights
12 through the administrative agency. The Court entered Final Judgment specifically because it found
13 "troubling" evidence that the Department of Justice issued a memorandum instructing Immigration
14 Judges to disregard the federal court's prior orders and "hold the position that *Yajure Hurtado*
15 remains good law." This judicial finding confirms that administrative exhaustion is futile, as the
16 agency has prejudged the issue in bad faith. Order, at *9.

17 6. Third, the Court explicitly held that "the core holding of *Yajure Hurtado* cannot be
18 squared with the [Court's] Order . . . *Yajure Hurtado* is no longer controlling; the legal conclusion
19 underlying the decision is no longer tenable." *Id.* at *6.

20 7. Petitioner requests that this Court take judicial notice of this Final Judgment and
21 grant the Writ of Habeas Corpus to enforce these established rights against the custodian
22 Respondents.

23 DATED this 22nd day of December, 2025.

s/ David L. Dawson
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CERTIFICATE OF SERVICE

I hereby certify that on December 22, 2025, I electronically filed the foregoing "NOTICE OF SUPPLEMENTAL AUTHORITY" and all accompanying documents with the Court Clerk using the CM/ECF System which will send notification of the filing to the following:

Robert LYNCH, Director, Detroit Field Office, U.S. Immigration and Customs Enforcement
333 Mt. Elliott Street
Detroit, MI 48207

Kristi NOEM, Secretary of the U.S. Department of Homeland Security
U.S. Department of Homeland Security
2707 Martin Luther King Jr. Avenue SE
Washington, DC 20528

Todd LYONS, Acting Director, U.S. Immigration and Customs Enforcement
U.S. Immigration and Customs Enforcement
500 12th Street SW
Washington, DC 20536

Pamela Bondi, Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530-0001

Richard Jones, Sheriff of Butler County
Butler County Jail
705 Hanover Street
Hamilton, OH 45011

Respectfully submitted,

/s/ David L. Dawson

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