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7 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO

9 Jordan RAMIREZ QUINTANA

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

10 Petitioner,

11 v.

12 Kevin RAYCRAFT, 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.

**NOTICE OF SUPPLEMENTAL
AUTHORITY**

18 Respondents.

1 1. Petitioner Jordan Ramirez Quintana respectfully notifies the Court of a dispositive
2 legal development. On February 18, 2026, the U.S. District Court for the Central District of
3 California entered an Order granting the Plaintiff Petitioners' Motion to Enforce Judgment in the
4 nationwide class action *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM (C.D.
5 Cal.).

6 2. A copy of the Court's Order is attached with this Notice.

7 3. This Order clarified the December 18, 2025 Final Judgment and Order in the class
8 action.

9 4. Specifically, pursuant to its authority at 28 U.S.C. § 2202, the Court specifically
10 vacated *Matter of Yajure Hurtado* as contrary to law under the Administrative Procedure Act
11 ("APA").

12 5. The Court explained that its Order was necessary due to guidance issued by Chief
13 Immigration Judge Teresa L. Riley via email instructing Immigration Judges not to comply with
14 the Final Judgment creating a Bond Eligible Class who are subject to detention under 8 U.S.C. §
15 1226 and so are eligible for bond hearings to be released from custody, and continue to follow the
16 Board of Immigration Appeals' decision in *Matter of Yajure Hurtado*. Exh. A, Order, at *13.

17 6. The Court indicated that due to this instruction, Bond Eligible Class Members
18 continued to be detained without a bond hearing. This behavior, "far crossed the boundaries of
19 constitutional conduct." February 18, 2026 Order at *10. The Judge found that the Respondents in
20 *Maldonado* continued to violate both the law and the Court's Order through Judge Riley's directive.
21 *Id.* at *15.

22 7. The Court's February 18, 2026 Order was therefore necessary to enforce the
23 December 18, 2025 Judgment, as the Executive Office for Immigration Review ("EOIR"),
24

1 pursuant to Judge Riley's email, continued to blatantly ignore the Court's Order and find non-
2 citizens in immigration detention such as Petitioner detained mandatorily under 8 U.S.C. § 1225.

3 8. As *Matter of Yajure Hurtado* has been vacated, Respondents may not rely on that
4 decision to continue to detain Petitioner and must afford him the rights afforded class members in
5 *Maldonado Bautista v. Santacruz* and at 8 U.S.C. § 1226(a).

6 9. Petitioner requests that this Court take judicial notice of this Order and the vacature
7 of *Matter of Yajure Hurtado*, and expeditiously grant the Writ of Habeas Corpus to enforce these
8 established rights against the custodian Respondents.

9 DATED this 24th day of February, 2026.

10 s/ David L. Dawson
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CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2026, 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:

Kevin RAYCRAFT, 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
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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,

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