

1 Rene L. Valladares
 Federal Public Defender
 2 Nevada State Bar No. 11479
 3 *Ryan Norwood
 Assistant Federal Public Defender
 4 Pennsylvania State Bar No. 332919
 *Jonathan M. Kirshbaum
 5 Assistant Federal Public Defender
 6 New York State Bar No. 2857100
 411 E. Bonneville Ave., Ste. 250
 7 Las Vegas, Nevada 89101
 (702) 388-6577
 8 Ryan_Norwood@fd.org
 9 Jonathan_Kirshbaum@fd.org

10 *Attorney for Petitioner Nhuan Nguyen Lam

12 UNITED STATES DISTRICT COURT
 13 DISTRICT OF NEVADA

14 Nhuan Nguyen Lam,
 15 Petitioner,
 16 v.
 17 John Mattos, *et al.*,
 18 Respondents.

Case No. 2:25-cv-02565-APG-DJA
Response to Notice of Removal

19 Respondents filed a notice of removal, stating that Petitioner was removed
 20 from the United States to Vietnam on January 12, 2026. ECF No. 9.

21 Counsel did not have the opportunity to meet with their client before he was
 22 deported and will not realistically be able to do so now.¹ However, counsel has no
 23

25 ¹ Counsel was scheduled to meet with Mr. Lam by video on January 9, 2026.
 26 He did not appear, and a representative from Nevada Southern Detention Center
 27 represented he has just been released. It appears likely he was in fact moved to a
 different facility to await the deportation that took place three days later.

1 basis to doubt the notice and exhibit provided by the government, and accordingly
2 requests the Court deny the petition as moot.
3
4

5 Dated January 20, 2026.

6 Respectfully submitted,

7
8 Rene L. Valladares
9 Federal Public Defender

10 */s/ Ryan Norwood*

11 Ryan Norwood
12 Assistant Federal Public Defender
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27