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6 *Pro Bono Attorney for Petitioner*

7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**

9
10 A.R.,

11 Petitioner,

12 v.

13 Kristi NOEM, Secretary, U.S.
14 DEPARTMENT OF HOMELAND
15 SECURITY; Pamela BONDI, U.S.
16 Attorney General, EXECUTIVE
17 OFFICE FOR IMMIGRATION
18 REVIEW; Todd LYONS, Acting
19 Director, IMMIGRATION AND
20 CUSTOMS ENFORCEMENT; Ernesto
21 Santacruz Jr., Acting Field Office
22 Director of Enforcement and Removal
23 Operations, Los Angeles Field Office,
24 IMMIGRATION AND CUSTOMS
25 ENFORCEMENT; Fereti SEMAIA,
26 Warden of DESERT VIEW ANNEX;
27 Joseph EDLOW, Director, U.S.
28 CITIZENSHIP AND IMMIGRATION
SERVICES; Rose KENDRICK, Acting
Director of National Benefits Center,
U.S. CITIZENSHIP AND
IMMIGRATION SERVICES,

Respondents.

Case No. 5:25-cv-03565

**PETITIONER'S SECOND
NOTICE OF SUPPLEMENTAL
AUTHORITY**

Petitioner hereby notifies the Court of supplemental authority issued by U.S. District Court Judge Anthony J. Trenga in the Eastern District of Virginia in *Brayan Lopez Sarmiento et. al. v. Paul Perry et al.*, Case No. 1:25-cv-01644-AJT-WBP (January 19, 2026), attached as Exhibit A. The Court of the Eastern District of Virginia ordered the immediate release of the Petitioner from immigration detention. Like A.R., the Petitioner is a recipient of Special Immigrant Juvenile Status. U.S. Citizenship and Immigration Services (“USCIS”) had granted him Deferred Action, and then terminated it after his detention. The Court found Petitioner was likely to succeed on the merits of his argument that USCIS’s termination notice – which provided no reason for the decision and no means of appeal – was “arbitrary and capricious” under the Administrative Procedure Act and violated the Fifth Amendment’s due process clause. The Court ordered immediate release, despite the fact that Petitioner, like A.R., had already received a bond hearing pursuant to 8 U.S.C. § 1226(a) at which the Immigration Court had denied bond. Furthermore, in a footnote, the Court noted that Respondents took the position that the grounds of deportability in 8 U.S.C. § 1227(a) (which are relevant to A.R.’s case) are “generally waive[d]” for SIJS noncitizens. *Id.* at n. 16.

DATED: January 20, 2026

Respectfully submitted,

By: /s/ Nina Rabin

Nina Rabin

UCLA Immigrant Family Legal Clinic

Attorney for Petitioner