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6 UNITED STATES DISTRICT COURT
7 DISTRICT OF ALASKA

8 S.A.E.A. (adult), individually and as parent and
next friend to her minor children, A.A.E.A.
9 (adult child of S.A.E.A), C.I.C.E. (minor child
of S.A.E.A), and M.M.E.A. (minor child of
10 S.A.E.A)

11 Petitioners,

12 v.

13 Laura HERMOSILLO, Acting Field Office
Director of Enforcement and Removal
14 Operations, Seattle Field Office, Immigration
and Customs Enforcement; Kristi NOEM,
15 Secretary, U.S. Department of Homeland
Security; U.S. DEPARTMENT OF
16 HOMELAND SECURITY; Pamela BONDI,
U.S. Attorney General; EXECUTIVE OFFICE
17 FOR IMMIGRATION REVIEW.

18 Respondents.
19

Case No. 3:26-cv-00072-SLG

**NOTICE OF TRANSFER AND
MOTION FOR ORDER REQUIRING
DISCLOSURE OF PETITIONERS'
LOCATION AND CUSTODIAN**

20 Petitioners, through undersigned counsel, respectfully notify the Court of developments
21 affecting this proceeding and move for limited relief necessary to permit the Court to exercise its
22 habeas jurisdiction.
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I. NOTICE TO THE COURT

On or about February 17, 2026, Petitioners, except for A.A.E.A., were transferred from the State of Alaska to an undisclosed location outside the State of Alaska. At that time, counsel was not informed of Petitioners' destination or present detention facility. Petitioners did not appear in the ICE Online Detainee Locator System when searched using their A-numbers and identifying information, and counsel was unable to communicate with Petitioners or obtain confirmation regarding the identity of their custodian.

On February 18, 2026, Petitioners filed a Respondents' Motion to Reopen Removal Proceedings and Stay Removal with the Portland Immigration Court, based on exceptional circumstances surrounding their failure to appear. Under 8 C.F.R. § 1003.23(b)(4)(ii), the timely filing of a motion to reopen an *in absentia* removal order based on exceptional circumstances automatically stays removal while the motion remains pending. That statutory and regulatory framework implements Petitioners' rights under INA § 240(b)(4)(A), codified at 8 U.S.C. § 1229a(b)(4)(A), including the right to be represented by counsel and to meaningfully pursue relief in removal proceedings. The Motion to Reopen is currently pending with Respondent EOIR. Disclosure of Petitioners' location and custodian is therefore necessary to permit counsel to continue representation and ensure compliance with the governing automatic stay of removal.

Counsel has since learned that Petitioner S.A.E.A. and her two younger children, C.I.C.E. and M.M.E.A., are presently in Mexico, where they arrived at approximately 2:30 p.m. Alaska time on February 18, 2026. This timing corresponds closely with the filing and delivery of the Motion to Reopen to the Portland Immigration Court. Based on the timing of these events, counsel has reason to believe that the Motion to Reopen was filed and delivered before Petitioners were removed to Mexico. Because the habeas petition had already been filed, this Court's jurisdiction

1 had attached, and Petitioners should not have been removed from the United States while the
2 automatic stay of removal was in effect and while this Court retained jurisdiction over their custody.

3 **II. MOTION FOR LIMITED RELIEF**

4 These events occurred after the filing of the Petition for Writ of Habeas Corpus in this
5 matter. The Court's jurisdiction attached at the time of filing. A post-filing transfer does not divest
6 this Court of jurisdiction over the habeas petition. *See Rumsfeld v. Padilla*, 542 U.S. 426 (2004).
7 However, in order for the Court to exercise that jurisdiction meaningfully, the current location and
8 custodian of Petitioners must be identified.

9 Petitioners therefore respectfully request that the Court enter a limited order requiring
10 Respondents, within twenty-four (24) hours:

- 11 1. To identify the current physical location of each Petitioner;
- 12 2. To identify the current custodian of each Petitioner;
- 13 3. To state the date and time of transfer from Alaska of each Petitioner;
- 14 4. To state the exact date and time of physical removal from the United States of
15 Petitioners S.A.E.A., C.I.C.E., and M.M.E.A..

16 Petitioners do not seek reconsideration of the Court's prior order denying temporary
17 injunctive relief. This request is limited to ensuring that the Court is able to exercise its
18 jurisdiction over the pending habeas petition.

19 DATED this 19th of February, 2026.

20 /s/ Lara Erin Nations

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VERIFICATION OF COUNSEL

I, LARA ERIN NATIONS, hereby certify that I am familiar with the case of the named
petitioners and that the facts as stated above are true and correct to the best of my knowledge and
belief.

/s/ Lara Erin Nations

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CERTIFICATE OF SERVICE

I certify that on February 19, 2026, I electronically filed the foregoing with the Clerk of Court
using the CM/ECF system, which will send notification to counsel of record.

/s/ Lara Erin Nations

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