

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

Javis Felton DAVIES (  ),

*Petitioner,*

v.

**Pamela Jo BONDI**, in her official capacity as  
Attorney General of the United States;

**Kristi NOEM**, in her official capacity as Secretary  
of the Department of Homeland Security;

**Todd LYONS**, in his official capacity as Acting  
Director of United States Immigration and Customs  
Enforcement;

**David EASTERWOOD**, in his official capacity as  
Acting Director, St. Paul Field Office, U.S.  
Immigration and Customs Enforcement; and

**James ARNOTT**, in his official capacity as Sheriff  
of Greene County.

*Respondents.*

Case No. 0:26-cv-  
01751 \_\_\_\_\_

**RESPONSE TO ORDER  
TO FILE DOCUMENT**

This filing is in response to the Court's Order for Party to File Document / Respond to Court, ECF 3. In that Order, the Court asked Petitioner to state whether "this matter is materially distinguishable, either factually or legally, from *Ali A. v. Bondi*, No. 26-cv-826 (ECT/DJF) (D. Minn. Feb. 3, 2026), ECF 12." While Petitioner respectfully believes this Court has the authority to exercise jurisdiction over the Petition, and respectfully asks the Court to do so, Petitioner acknowledges that this case is not factually or legally distinguishable from *Ali A.* in any way relevant to the Court's opinion in that case.

If the Court determines that jurisdiction is lacking, it is Petitioner's position that the Petition should be dismissed without prejudice to refile in the Western District of Missouri, where the Petitioner is currently located, in the Greene County Jail.

Respectfully submitted,

Dated: March 5, 2026

DORSEY & WHITNEY LLP

/s/ Shannon L. Bjorklund

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