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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
SAN DIEGO

Luis Fernando RAX GOMEZ, Petitioner, v. Pamela J. Bondi, et al., Respondents.	Case No. 26-cv-1553-JO-DEB Agency No. [redacted] **SUPPLEMENTAL BRIEF**

Upon a reading of the Declaration of Jesus Blanco, Petitioner would like to clarify the record. While it is correct that Petitioner was granted release on recognizance by an immigration judge on March 30, 2026, he was not released from custody until April 1, 2026, in the late evening.

In fact, Petitioner's counsel believed he was released on March 30, 2026, because around midnight we checked the online ICE Detainee Locator (https://locator.ice.gov/odls/#/search) and he was not listed as being in custody. However, two days later on the morning of April 1, 2026, Petitioner's family informed us he was not yet released. For this reason, counsel's office contacted the

Office of the Principal Legal Advisor, who gave us contact information for his assigned ICE officer, Denise E. Barroga. *See* Ex. C, Email to the Office of the Principal Legal Advisor. On Wednesday, April 1, 2026, at 2:38 p.m., Denise E. Barroga confirmed Petitioner would be released that evening, after 8 p.m. *See* Ex. D, Email from Denise E. Barroga and release paperwork.

From Monday, March 30, 2026, until April 1, 2026, in the late evening, Petitioner did not show on the ICE detainee locator, but was still in custody.

Therefore, while his release occurred before the required period, it is worth noting for the record that Respondents' internal records incorrectly indicated he was released on March 30, 2026, and the facts were incorrectly conveyed to the court.

Respectfully submitted,

Dated: April 3, 2026

/s/ *Leah L. Chavarria*
Leah L. Chavarria
Counsel for Petitioner