

1 TODD BLANCHE
Acting Attorney General of the United States
2 SIGAL CHATTAH
First Assistant United States Attorney
3 District of Nevada
Nevada Bar Number 8264

4 TAMER B. BOTROS
Assistant United States Attorney
5 Nevada Bar No. 12183
6 501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
7 Phone: (702) 388-6336
Fax: (702) 388-6787
8 Tamer.Botros@usdoj.gov
Attorneys for the Federal Respondents

9
10 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

11 ROBERTO VILLALTA MARTINEZ,
12 Petitioner,
13 v.
14 TODD BLANCHE, *et al.*
15 Respondents.

Case No. 2:26-cv-01970-RFB-BNW

**Federal Respondents' Notice
Regarding Class Membership and
Responses to Interrogatories Pursuant
to Court Order (ECF No. 4)**

**NO ORAL ARGUMENT
REQUESTED**

17 Federal Respondents hereby file their Supplemental Notice Regarding Class
18 Membership pertaining to Petitioner Roberto Villalta Martinez in accordance to the
19 Court's Order Appointing Counsel (ECF No. 4). Pursuant to the Order, Federal
20 Respondents do not request oral argument or an evidentiary hearing on the Petition and
21 request the Court rule on the papers. ECF No. 4.

22 Pursuant to the Order Granting Partial Summary Judgment in *Jacobo-Ramirez v.*
23 *Mullin*, No. 2:25-cv-02136-RFB-MDC, 2026 LEXIS 175584 (D. Nev. Mar. 30, 2026), this
24 Court certified the class in its class wide judgment. Based on the decision by this Court in
25 *Jacobo-Ramirez*, and the Order to Show Cause in this matter, Petitioner Roberto Villalta
26 Martinez is a Class Member. For documents pertaining to Petitioner see Exhibit A, with
27 accompanying Federal Respondents' Certification Regarding Document Search. Federal

28 / / /

1 Respondents certify that the documents pertaining to Petitioner (Exhibit A) are all the
2 documents that are in their possession, custody and control at this time.

3 Federal Respondents reserve their right to appeal the decisions in *Jacobo-Ramirez* and
4 in this matter. Federal Respondents do not waive nor concede their prior litigated positions
5 regarding 8 U.S.C. § 1225(b)(2)(A) and fully incorporate them herein for appellate
6 purposes.

7 Furthermore, pursuant to the Court's Order (ECF No. 4), Federal Respondents
8 have answered the Interrogatories. See Federal Respondents' Answers to Interrogatories
9 attached hereto as Exhibit B.

10 Respectfully submitted this 10th day of July 2026.

11 TODD BLANCHE
12 Acting Attorney General of the United States
13 SIGAL CHATTAH
First Assistant United States Attorney

14 /s/ Tamer B. Botros
15 TAMER B. BOTROS
Assistant United States Attorney