

1 Ramsey Judah, Esq. (CA SBN 342300)
2 Judah Law Group
3 1026 W Foothill Blvd
4 Upland, CA 91786
5 Tel: 626.899.7667
6 Ramsey@JudahLawGroup.com

7 Hassan M. Ahmad, Esq.
8 The HMA Law Firm, PLLC
9 6 Pidgeon Hill Drive, Suite 330
10 Sterling, VA 20165
11 Tel: 703.964.0245
12 Email: hma@hmalegal.com
13 Admitted *pro hac vice*
14 Attorneys for Petitioner

11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA
13 FRESNO DIVISION

15 AJET ARUCI,

17 Petitioner,

19 v.

21 WANDA WILSON, et al.,

23 Respondents.

Case No. 1:26-cv-05132-JLT-EGC

25
26 PETITIONER'S RESPONSE TO THE COURT'S JULY 13, 2026 ORDER
27 AND NOTICE OF SUPPLEMENTAL FACTS
28

Petitioner submits this response to the three questions posed in the Court's July 13, 2026 Order, and gives notice of developments postdating his July 24, 2026 reply.

I. RESPONSE TO THE COURT'S JULY 13, 2026 INQUIRIES

The Court directed the parties to indicate (1) whether they request a hearing; (2) whether they agree to convert the request for a temporary restraining order into a preliminary injunction without further briefing; and (3) whether they request additional briefing on the merits of the petition.

1. **Hearing.** Petitioner does not request a hearing and submits the matter on the papers.
2. **Conversion.** Petitioner agrees to conversion of the request for a temporary restraining order into a preliminary injunction without further briefing. Respondents have stated that they do not oppose conversion. Opp. at 4-5.
3. **Additional briefing.** Petitioner does not request additional briefing on the merits and asks that the Court rule on the existing record.

The parties are therefore in agreement on all three questions.

II. SUPPLEMENTAL FACTS

A. Petitioner remains in custody in this District.

On August 3, 2026, the Court directed Respondents to report whether Petitioner had been removed. Dkt. 9. Respondents reported on August 7, 2026, attaching the ICE Daily Report of August 6, 2026, which lists Petitioner as "ACTIVE ONSITE" at Golden State Annex. Dkt. 10 & Ex. A thereto. Petitioner remains detained in this District, in the custody of Respondent Wilson.

1 **B. Petitioner will again be unable to attend the interview on his wife's petition, because he is**
2 **detained.**

3
4 On July 13, 2026, USCIS issued a new interview notice on the Form I-130 filed by Petitioner's
5 United States citizen wife, receipt number IOE0920189334, setting the interview for **Monday, August**
6 **17, 2026 at 8:30 a.m.** at the Buffalo Field Office. Ex. 1.

7
8 Petitioner cannot appear. He is confined at Golden State Annex in McFarland, California. On
9 August 12, 2026, counsel transmitted a written request to the Buffalo Field Office by FedEx overnight
10 asking USCIS to reschedule the August 17 interview, to transfer the matter to the field office with
11 jurisdiction over the family's California residence, and to reissue notices once Petitioner is released.
12 Ex. 2. USCIS has not responded.

13
14 This is the second interview Petitioner will have missed in as many months, and both for the
15 same reason. The petition alleged that ICE arrested him at a departure gate two days before the June
16 30, 2026 interview, as he traveled to attend it, carrying the government's own notice. Pet. ¶¶ 2-3, 26.
17 That has now recurred while this matter has been under submission. The interview notice warns that
18 failure to appear without good cause may result in denial. Ex. 1.

19
20 **C. Community ties.**

21
22 Petitioner submits as Exhibit 3 thirteen letters from members of his community in New York
23 and California. They are offered not in mitigation but as evidence bearing on Respondents' sole
24 contested factual assertion — that Petitioner “absconded from New York to California.” Opp. at 4. The
25 letters describe a man who lived openly in both places: known to neighbors, employers, and his
26 congregation, at a known address, throughout the period Respondents characterize as concealment. The
27 family's relocation from New York to California occurred over a transitional period beginning in 2023,
28 during which Petitioner reported telephonically as directed by ICE. Several letters describe the family's

1 presence in the Sacramento area from early 2024 forward, reflecting the point at which the transition
2 was complete, though they kept their residence in New York and did not abandon it. Their contents are
3 consistent with the sworn declaration of Samiya Babar Malik and with Respondents' own records
4 reflecting telephonic reporting through January 2026.
5

6 Petitioner offers these facts not as new grounds for relief, but because they bear on the harm
7 alleged in the petition and on the relief the Court has already found warranted. Dkt. 5.
8

9 Dated: August 14, 2026
10

11 Respectfully submitted,
12

13 /s/ Hassan M. Ahmad
14 Hassan M. Ahmad, Esq.
15 The HMA Law Firm, PLLC
Admitted pro hac vice

16 /s/ Ramsey Judah
17 Ramsey Judah, Esq. (CA SBN 342300)
Judah Law Group

18 Attorneys for Petitioner
19
20

21 **EXHIBITS**

- 22
- 23 1. Form I-797C Interview Notice, notice date July 13, 2026 (interview set August 17, 2026).
 - 24 2. Letter to USCIS Buffalo Field Office requesting reschedule, August 12, 2026, with FedEx
25 proof of delivery.
 - 26 3. Letters of community support (13).
- 27
28