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9 IN THE UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA
11

12 PATIENCE UKATTAH,

13 Petitioner,

14 v.

15 CHRISTOPHER CHESTNUT, et al.,

16 Respondents.
17

CASE NO. 1:26-CV-05300-DAD-AC

**RESPONDENTS' ANSWER TO PETITION FOR
HABEAS CORPUS AND OPPOSITION TO
MOTION FOR TEMPORARY RESTRAINING
ORDER; RESPONSE TO ORDER TO SHOW
CAUSE; REQUEST TO DISSOLVE THE DO
NOT REMOVE/TRANSFER ORDER (ECF 4)**

18 I. INTRODUCTION

19 Respondents do not request a hearing. Petitioner concedes that he is subject to an order of
20 removal, but the government is forbidden from removing him to Nigeria. ECF 1 at 10 (denial of asylum
21 but granted withholding to Nigeria). The only thing preventing his removal from the United States is
22 this Court's do not remove/transfer order. ECF 4. The instant matter differs from the cases the Court
23 cited in its minute order (ECF 4) in that Petitioner has a final order of removal and ICE is ready to
24 effectuate removal.

25 Petitioner is on notice that the government intends to remove him to Ghana, Ghana has agreed to
26 accept third country nationals, no travel documents for removal to Ghana are required, and ICE has
27 scheduled his removal within the next three weeks. Thus, there is a significant likelihood of removal in
28 the reasonably foreseeable future. Petitioner does not specifically claim any fear of removal to Ghana,

1 rather he argues that the government's decision to remove him to a third country violates his
2 constitutional and statutory rights.

3 He is wrong. Petitioner has very limited constitutional rights as a person who illegally entered
4 the United States and is subject to a final order of removal. The government does not infringe on any
5 constitutional rights by executing a final order of removal. Moreover, this Court does not have
6 jurisdiction over the government's decision to execute a final removal order. 8 U.S.C. § 1252(g).

7 II. FACTS

8 Petitioner is a native and citizen of Nigeria, who entered the United States on April 13, 2000,
9 with a temporary B-2 visitor visa. *Declaration of Deportation Officer Christian Rivera* ("Decl") dated
10 July 13, 2026; Exhibit 1. Petitioner was authorized to stay as a B-2 visitor visa until October 12, 2000.

11 *Id.* Petitioner remained in the United States past October 12, 2000. *Id.*

12 On January 10, 2005, Petitioner was ordered removed from the United States by an immigration
13 judge (IJ). Decl., ¶ 6; Exhibit 2. The IJ also granted her withholding of removal to Nigeria. Petitioner
14 waived her appellate rights. *Id.*

15 Petitioner has never been placed on an Order of Supervision ("OSUP") or an order of release
16 from recognizance ("OREC"). Decl, ¶ 7.

17 On July 7, 2026, Petitioner was taken into DHS custody. Decl, ¶ 8; Exhibits 1, 3.

18 The government of Ghana has agreed to accept third country nationals. Decl, ¶ 9.

19 Petitioner is being processed for removal to Ghana as a third country alternative, and ICE/ERO
20 does not require travel documents to effectuate her removal to Ghana. Decl, ¶ 10.

21 Petitioner is scheduled to be removed to Ghana within the next three weeks. Decl, ¶ 11.

22 Petitioner remains subject to detention pursuant to 241(a)(6) of the Immigration and Nationality
23 Act [8 USC § 1231(a)(6)].

24 Finally, here, nothing the government has done in this case to remove Petitioner to Ghana was or
25 is unlawful. Petitioner is not entitled to be released into the United States simply because the
26 government is lawfully removing him to Ghana.

27 To succeed on his request for release, Petitioner must show that he is "in custody in violation of
28 the Constitution or laws or treaties of the United States." *See* 28 U.S.C. § 2241. Petitioner cannot meet

his burden under the facts of this case.

III. BACKGROUND

A. *D.V.D. v. Dep't of Homeland Security*

In March 2025, three plaintiffs instituted a putative class action suit challenging their third country removals in the District of Massachusetts captioned *D.V.D. v. DHS*, No. 25-cv-10676 (D. Mass.). On March 28, 2025, that court entered a TRO enjoining DHS and others from “[r]emoving any individual subject to a final order of removal from the United States to a third country, *i.e.*, a country other than the country designated for removal in immigration proceedings” unless certain conditions were met. *D.V.D. v. U.S. Dep’t of Homeland Sec.*, 2025 WL 942948, at *1 (D. Mass. Mar. 28, 2025). On April 18, 2025, the court in *D.V.D.* issued an order granting the plaintiffs’ motion for class certification and motion for preliminary injunction. *D.V.D. v. U.S. Dep’t of Homeland Sec.*, 778 F. Supp. 3d 355, 394 (D. Mass. 2025). A class was certified pursuant to Rule 23(b)(2) of the Federal Rules of Civil Procedure without a provision for an opt out. *See id.* at 386.¹ The Preliminary Injunction was national in effect and established certain procedures that DHS was required to follow before removing an alien with a final order of removal to a third country. Specifically, the class in *D.V.D.* is defined as:

All individuals who have a final removal order issued in proceedings under Section 240, 241(a)(5), or 238(b) of the INA (including withholding-only proceedings) who DHS has deported or will deport on or after February 18, 2025, to a country (a) not previously designated as the country or alternative country of removal, and (b) not identified in writing in the prior proceedings as a country to which the individual would be removed.

Id. at 378.

On May 21, 2025, the *D.V.D.* court issued a Memorandum on Preliminary Injunction offering the following summary and clarification of its Preliminary Injunction:

All removals to third countries, *i.e.*, removal to a country other than the country or countries designated during immigration proceedings as the country of removal on the non-citizen’s order of removal, see 8 U.S.C. § 1231(b)(1)(C), must be preceded by written notice to both the non-citizen and the non-citizen’s counsel in a language the non-citizen can understand. Dkt. 64 at 46–47. Following notice, the individual must be given a meaningful opportunity, and a minimum of ten days, to raise a fear-based claim for CAT protection prior to removal. *See id.* If the non-citizen demonstrates “reasonable fear” of removal to the third country, Defendants must move to reopen the non-citizen’s

¹ *See Crawford v. Honig*, 37 F.3d 485, 487 (9th Cir. 1994), *as amended on denial of reh’g* (Jan. 6, 1995) (“[A] class action for injunctive relief certified under Fed.R.Civ.P. 23(b)(2) . . . does not require notice or permit members to opt out.”).

immigration proceedings. *Id.* If the non-citizen is not found to have demonstrated a “reasonable fear” of removal to the third country, Defendants must provide a meaningful opportunity, and a minimum of fifteen days, for the non-citizen to seek reopening of their immigration proceedings. *Id.*

D.V.D. v. U.S. Dep’t of Homeland Sec., 2025 WL 1453640, at *1 (D. Mass. May 21, 2025). The *D.V.D.* Court indicated that the Order applied “to the Defendants, including the Department of Homeland Security, as well as their officers, agents, servants, employees, attorneys, any person acting in concert, and any person with notice of the Preliminary Injunction.” *Id.*

On June 23, 2025, the United States Supreme Court stayed the District of Massachusetts’ preliminary injunction pending appeal in the First Circuit Court of Appeals. *Dep’t of Homeland Sec. v. D.V.D.*, ___ U.S. ___, 145 S. Ct. 2153 (2025). That same day, the District Court ordered that, notwithstanding the Supreme Court’s order, its remedial order granting relief to eight individual class members DHS sought to remove to South Sudan remained in effect. Order, *D.V.D.* (Dkt. 176). Defendants moved to clarify the Supreme Court’s Order and, on July 3, 2025, the Supreme Court granted the motion, allowing the eight individual aliens to be removed to South Sudan. *Dep’t of Homeland Sec. v. D. V. D.*, ___ U.S. ___, 145 S. Ct. 2627, 2629 (2025).

On February 25, 2025, the District Court in *D.V.D.*, granted summary judgment but stayed that decision to permit the First Circuit to rule on a motion for stay. *D.V.D. v. U.S. Dep’t of Homeland Sec.*, No. CV 25-10676-BEM, 2026 WL 521557, at *44 (D. Mass. Feb. 25, 2026).

On March 16, 2026, the First Circuit granted the government’s motion for a stay pending appeal. See Doc. 118417272, *D.V.D., et al v. U.S. Department of Homeland Security, et al.*, No. 26-1212, 1st Cir., Feb. 28, 2026. The class certification in *D.V.D.* remains in effect notwithstanding the Supreme Court’s stay.

IV. ARGUMENT

Petitioner’s request for an order releasing him from immigration detention and a temporary restraining order against the government from removing him to a third country is a request for extraordinary relief. A party seeking mandatory injunctive relief “must establish that the law and facts clearly favor [his] position, not simply that [he] is likely to succeed.” *Garcia v. Google, Inc.*, 786 F.3d 733, 740 (9th Cir. 2015) (emphasis in original)). In general, mandatory injunctions should not be granted

“unless extreme or very serious damage will result” and should not be issued “in doubtful cases or where the injury complained of is capable of compensation in damages.” *Anderson v. United States*, 612 F.2d 1112, 1115 (9th Cir. 1979).

1. No jurisdiction to prevent the government from removing Petitioner to Ghana.

The Immigration and Nationality Act—8 U.S.C. § 1252(g)—strips district courts of authority to hear claims arising from the execution of removal orders. Because Petitioner is detained to carry out his final removal order, his habeas petition is merely an impermissible attempt to challenge that ongoing legal process. Section 1252(g) provides that “no court shall have jurisdiction to hear any cause or claim by or on behalf of any alien arising from the decision or action by the Attorney General to commence proceedings, adjudicate cases, or execute removal orders against any alien under this chapter.” *Id.* This provision limits habeas corpus jurisdiction, including under § 2241.

This Court issued the do not transfer/remove order to maintain its own jurisdiction over the habeas Petition. But because section 1252(g) divests the Court of jurisdiction over that specific claim, the TRO must be dissolved.

2. Petitioner’s cannot show his detention is unlawful or indefinite.

To succeed on his request for release, Petitioner must show that he is “in custody in violation of the Constitution or laws or treaties of the United States.” *See* 28 U.S.C. § 2241. Petitioner claims that his detention violates due process and the INA.² These claims lack merit.

i. Petitioner’s detention is not “indefinite.”

In *Zadvydas v. Davis*, 533 U.S. 678, 701 (2001), the Supreme Court analyzed whether the potentially open-ended duration of detention pursuant to 8 U.S.C. § 1231(a)(6) is constitutional. The Court read an implicit limitation of post-removal detention “to a period reasonably necessary to bring about that alien’s removal from the United States.” *Zadvydas*, 533 U.S. at 689. It was further specified

² For instance, Petitioner stated that Petitioner’s revocation of her release was not in accordance with the INA and its regulations. ECF 1 at 15. However, Petitioner was never placed on an order of release or supervision. *See Declaration of Deportation Officer Christian Rivera*. Petitioner argues that procedural due process, the APA, and regulations mandate meaningful notice and opportunity to present a fear-based claim to an IJ before DHS deports him to a third country. ECF 1 at 15-16. Petitioner has not provided any evidence that she expressed a fear of being removed to Ghana.

1 that Section 1231(a)(6) does not permit indefinite detention. *Id.* Thus, “once removal is no longer
2 reasonably foreseeable, continued detention is no longer authorized by statute.” *Id.*, at 699.

3 The *Zadvydas* Court recognized that as the length of post-order detention grows, a sliding scale
4 of burdens is applied to assess the continuing lawfulness of a noncitizen’s post-order detention. *Id.*, at
5 701 (stating that “for detention to remain reasonable, as the period of post-removal confinement grows,
6 what counts as the ‘reasonably foreseeable future’ conversely would have to shrink”). However, the
7 Supreme Court determined that it is “presumptively reasonable” for the Government to detain a
8 noncitizen for six months following entry of a final removal order, while it worked to remove the
9 noncitizen from the United States. *Id.*, at 701. Thus, the Supreme Court implicitly recognized that six
10 months is the earliest point at which a noncitizen’s detention could raise constitutional issues. *Id.*

11 Moreover, as the Supreme Court has noted, the six-month presumption “does not mean that
12 every alien not removed must be released after six months. To the contrary, an alien may be held in
13 confinement until it has been determined that there is no significant likelihood of removal in the
14 reasonably foreseeable future.” *Id.*

15 *Zadvydas* places the burden is on a petitioner to come forward with evidence that there is “good
16 reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future.”
17 *Pelich v. I.N.S.*, 329 F.3d 1057, 1059 (9th Cir. 2003) (citing *Zadvydas*). If the petitioner meets his
18 evidentiary burden, the government must then introduce evidence to refute the petitioner’s assertion. *Id.*

19 Petitioner has not carried his initial burden. Petitioner relies entirely on a speculation that his life
20 or freedom would be threatened in a third country. But Petitioner has never expressed a fear of removal
21 to Ghana. Here the record demonstrates that the process of removing him to Ghana will be swift, his
22 current period of detention after the removal period began to accrue so far has been relatively short, and
23 this Court’s do not transfer/remove order is the only individual barrier to his particular removal.

24 In short, Petitioner’s evidence does not establish that there is “no significant likelihood of
25 removal in the reasonably foreseeable future.” *Zadvydas*, 533 U.S. at 771 (emphasis added).

26 The only requirement on Respondents under *Zadvydas* is to rebut a sufficient showing by
27 Petitioner that there is no significant likelihood of removal in the reasonably foreseeable future.
28 Respondents have certainly negated Petitioner’s deficient effort to show that there is “no significant

1 likelihood” that they will be able to remove him in the reasonably foreseeable future. Respondents have
2 shown that his removal to Moldova in relatively short order is certain. Thus, Petitioner’s request for
3 release from detention should be denied as such release would interfere with the government’s lawful
4 execution of Petitioner’s final order of removal.

5 **B. Petitioner cannot succeed in his claim that the government lacks the legal authority to**
6 **remove him to a third country.**

7 As indicated, the Court should also deny Petitioner’s request for an order barring his removal to
8 a third country. *See* 8 U.S.C. § 1252(g). Likewise, Petitioner is not entitled to the relief he seeks in any
9 event. He is an individual subject to a final order of removal who now purportedly fears removal to a
10 third country. Because Petitioner is bound as a member of the non-opt out class of individuals
11 governed by the *D.V.D.* nationwide preliminary injunction, which the Supreme Court has now stayed
12 finding that the government is likely to prevail on the merits of its appeal, this Court should dismiss the
13 action. Simply put, Petitioner is not entitled to another bite at the apple before this Court to obtain relief
14 that has already been stayed by the Supreme Court. Given that dismissal of this claim is the appropriate
15 remedy, Petitioner is not entitled to the relief sought in his motion.

16 As explained above, the District of Massachusetts entered a preliminary injunction prescribing
17 the process to which *D.V.D.* class members were entitled before removal to a third country and certified
18 a non-opt out class. Petitioner is undisputedly a member of that class. The Supreme Court stayed the
19 preliminary injunction but left certification of the non-opt out class intact, signaling that the *D.V.D.* class
20 members would not succeed on the merits of their claims and the Government would ultimately prevail.

21 First, this Court should avoid providing Petitioner with relief that eventually may conflict with
22 the relief, if any, ultimately provided to the *D.V.D.* class. The Petitioner’s request for a preliminary
23 injunction preventing his removal to a third country challenges how Respondents should implement a
24 decision to remove Petitioner to a third country should that occur. That is precisely the challenge
25 brought by the *D.V.D.* class. This Court, therefore, should not wade into Petitioner’s claims because
26 such claims are being actively litigated in the *D.V.D.* class action, which is currently before the First
27 Circuit. To do otherwise would cut against the entire purpose of a Rule 23(b)(2) non-opt out class
28 action and risk an order that will conflict with not only the relief, if any, eventually provided to the

1 *D.V.D.* class, but also the Supreme Court’s rejection of the relief initially temporarily provided to class
2 members by the District of Massachusetts.

3 Second, this Court should avoid providing Petitioner with relief that is likely to be rejected and
4 overturned by the Supreme Court. The District of Massachusetts attempted to set parameters around
5 third country removals, but the Supreme Court, in staying the *D.V.D.* preliminary injunction, effectively
6 rejected those parameters and signaled that ultimately the class members would not succeed on the
7 merits of the case and the Government would prevail. The Supreme Court confirmed that its stay applied
8 to individual class members by granting the government’s motion for clarification on July 3, 2025.
9 Petitioner cannot now make an end run around the Supreme Court’s stay in *D.V.D.* by seeking relief in
10 this Court. The Supreme Court has already found that Respondents are likely to succeed on the legal
11 arguments presented in response to the instant habeas petition. Allowing Petitioner’s habeas petition to
12 proceed and continuing to stay his removal to a third country would therefore be directly contrary to the
13 Supreme Court’s decision to stay the preliminary injunction in *D.V.D.*

14 Additionally, courts recognize that members of class action lawsuits should not be permitted to
15 bring separate actions that litigate issues raised in the class action. See *Wynn v. Vilsack*, 2021 WL
16 7501821, at *3 (M.D. Fla. Dec. 7, 2021) (collecting cases) (“Multiple courts of appeal have approved
17 the practice of staying a case, or dismissing it without prejudice, on the ground that the plaintiff is a
18 member of a parallel class action.”) (internal quotations omitted). This prevents class members from
19 avoiding the binding results of the class action. *Goff v. Menke*, 672 F.2d 702, 704 (8th Cir. 1982).

20 This is also the rule in this Circuit. A district court may properly dismiss an individual complaint
21 where the plaintiff is a member in a class action, to the extent the individual action duplicates the claims
22 and seeks the same relief as the class action. *Pride v. Correa*, 719 F.3d 1130, 1133 (9th Cir. 2013)
23 (discussing *Crawford v. Bell*, 599 F.2d 890, 892 (9th Cir. 1979)). Such a dismissal is up to the court’s
24 discretion based on its inherent power to control its own docket. *Crawford*, 599 F.2d at 893. But it is
25 “imperative to avoid concurrent litigation in more than one forum whenever consistent with the rights of
26 the parties.” *Id.*; see *Frost v. Symington*, 197 F.3d 348, 359 (9th Cir. 1999) (“To the extent that a class
27 action involving the same issues raised by [plaintiff] is currently pending . . . [he] may have to bring all
28 of this related claims for equitable relief . . . through . . . class counsel.”).

1 This Court should decline to exercise jurisdiction over the third country removal claim as a
 2 matter of comity because the District of Massachusetts has certified a class action that includes the same
 3 claim Petitioner is pursuing here. *Pacesetter Systems, Inc. v. Medtronic, Inc.*, 678 F.2d 93, 94-95 (9th
 4 Cir. 1982) (“There is a generally recognized doctrine of federal comity which permits a district court to
 5 decline jurisdiction over an action when a complaint involving the same parties and issues has already
 6 been filed in another district.”). Thus, dismissal of Petitioner’s claims for relief from third country
 7 removal is warranted and no temporary restraining order on the same claim should be issued.

8 Consequently, in light of *D.V.D.*, federal district courts in other jurisdictions have denied
 9 claimants the same relief that the Petitioner is seeking here. See *Ghamelian v. Baker*, 2025 WL 2049981,
 10 at *3 (D. Md. July 22, 2025), *reconsideration denied*, 2025 WL 2074155 (D. Md. July 23, 2025) (“In
 11 light of Plaintiff’s apparent class membership, claims relating to his potential third country removal are
 12 more appropriately resolved in the *D.V.D.* case and will not be addressed in this Court.”) (footnote
 13 omitted); *Tanha v. Warden*, 2025 WL 2062181, at *5 (D. Md. July 22, 2025) (matters pertaining to
 14 Petitioner’s removal destination are more properly addressed by the District of Massachusetts).

15 This case is similar to *Shahvaladian v. Garland*, No. 5:25-CV-03001-SPG-AGR, 2025 WL
 16 3692141 (C.D. Cal. Dec. 16, 2025), where the district court denied a motion for temporary restraining
 17 order (where an alien was granted withholding of removal) and ICE sought to remove him to a third
 18 country. As the court in *Shahvaldaian* succinctly stated:

19 “Petitioner has not shown a likelihood of success on the merits to warrant an order restraining the
 20 Government from deporting Petitioner to a third country. Under 8 U.S.C. § 1231(b)(2), the
 21 Government is permitted to remove a non-citizen to a third country in certain circumstances. The
 22 Supreme Court has summarized this statutory framework as follows:

23 The statute provides four consecutive removal commands: (1) An alien shall be removed to the
 24 country of his choice ..., unless one of the conditions eliminating that command is satisfied; (2)
 25 otherwise he shall be removed to the country of which he is a citizen ..., unless one of the
 26 conditions eliminating that command is satisfied; (3) otherwise he shall be removed to one of the
 27 countries with which he has a lesser connection ...; or (4) if that is impracticable, inadvisable, or
 28 impossible, he shall be removed to another country whose government will accept the alien into
 that country.

Jama v. ICE, 543 U.S. 335, 341 (2005) (internal quotation marks and citations omitted). Thus,
 third-country removal is not per se unlawful under the INA. Petitioner has made no showing that
 the Government is likely to deport Petitioner to a third country in violation of the statute

V. CONCLUSION

For the foregoing reasons, the Petition for Writ of Habeas Corpus and motion for temporary restraining order be denied, and the do not transfer/remove order be dissolved (ECF 4) so that the government may lawfully execute Petitioner's final order of removal.

Respectfully submitted,

Dated: July 13, 2026

ERIC GRANT
United States Attorney

By: /s/ Anthony Andrews
ANTHONY ANDREWS
Assistant United States Attorney

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

Patience Ukattah,	)	CASE NO. 1:26-cv-05300-DAD-AC
	)	
Petitioner,	)	DECLARATION OF
	)	DEPORTATION OFFICER
v.	)	CHRISTIAN RIVERA
	)	
Christopher Chestnut, et al.,	)	
	)	
Respondents.	)	

I, Christian Rivera, make the following statements under oath and subject to the penalty of perjury:

1. I am a Deportation Officer ("DO") with the U.S. Department of Homeland Security ("DHS"), U.S. Immigration and Customs Enforcement ("ICE"), Enforcement and Removal Operations ("ERO"), in the Bakersfield, California, sub-office of the San Francisco Field Office. I have been employed with DHS since June, 2025. I currently serve as a DO and am assigned to the ERO Bakersfield Sub-Office's Detained Unit, which oversees the aliens detained at the California City Processing Center ("CCPC"), which is a contract detention facility in California City, California managed by the CoreCivic.

2. I am familiar with ICE policies and procedures governing the detention and removal of aliens who lack lawful immigration status in the United States.

3. I am the DO assigned to the case of Ms. Patience Ukattah ("Petitioner"). The facts in this declaration are based on my personal knowledge; consultation with other ICE personnel; and review of official documents, systems, and records maintained by the agency and DHS, and other relevant sources during the regular course of my duties. I provide this declaration based on the best of my knowledge, information, belief and reasonable inquiry for the above captioned case.

1 4. I have obtained and attached to my declaration true and correct copies of the following
2 documents from the above-named Petitioner's case file and records maintained by the DHS, which will
3 be referenced as Exhibits ("Exh") as follows:

4 Exhibit 1: Form I-213, Record of Deportable/Inadmissible Alien, dated July 7, 2026;

5 Exhibit 2: Order of the Immigration Judge, dated January 10, 2005 and;

6 Exhibit 3: Form I-205, Warrant of Removal/Deportation dated July 7, 2026.
7

8 5. Petitioner is a citizen and national of Nigeria, who entered the United States on April 13,
9 2000 with a temporary B-2 visitor visa. Exh. 1. Petitioner was authorized to stay as a B-2 visitor until
10 October 12, 2000. *Id.* Petitioner remained in the United States past October 12, 2000. *Id.*

11 6. On January 10, 2005, Petitioner was ordered removed from the United States by an
12 Immigration Judge ("IJ"). Exh. 2. The IJ also granted her Withholding of Removal to Nigeria. *Id.*
13 Petitioner waived her appellate rights. *Id.*
14

15 7. Petitioner has never been placed on an Order of Supervision ("OSUP") or an Order of
16 Release from Recognizance ("OREC").

17 8. On July 7, 2026, Petitioner was taken into DHS custody. Exhs. 1 and 3.

18 9. The government of Ghana has agreed to accept third country nationals.

19 10. Petitioner is being processed for removal to Ghana as a third country alternative, and
20 ICE/ERO does not require travel documents to effectuate her removal to Ghana.
21

22 11. Petitioner is scheduled to be removed to Ghana within the next three weeks.

23 12. Petitioner remains subject to detention pursuant to section 241(a)(6) of the Immigration
24 and Nationality Act ("INA") or ("Act").

25 //

26 //

27

28

1 I declare, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the foregoing is true and
2 correct to best of my knowledge, information, belief, and reasonable inquiry.

3 Dated: July 13, 2026

4
5
6 CHRISTIAN A RIVERA
SALAZAR

Digitally signed by CHRISTIAN A
RIVERA SALAZAR
Date: 2026.07.13 09:24:17 -07'00'

7 Christian Rivera
8 Deportation Officer
9 Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security