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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

R.M.L., a minor; V.M.L., a minor; by and through Erica Santamaria as Guardian Ad Litem,

Petitioner,

v.

RUBY HERNANDEZ, Federal Field Specialist, Office of Refugee Resettlement; NIKY HYMEL, Federal Field Specialist Supervisor, Office of Refugee Resettlement; ALEX J. ADAMS, Assistant Secretary of the Administration of Children and Families; ANGIE SALAZAR, Acting Director of the Office of Refugee Resettlement; and ROBERT F. KENNEDY, Secretary of the U.S. Department of Health and Human Services,

Respondents.

Case No. 2:26-cv-08585

Hon. Monica Ramirez Almadani
United States District Judge

Hon. Douglas F. McCormick
United States Magistrate Judge

PETITIONERS' OBJECTIONS TO REPORT AND RECOMMENDATION

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INTRODUCTION

Petitioners R.M.L. and V.M.L. ("Petitioners"), through counsel, respectfully object to the September 8, 2026, Report and Recommendation of the Magistrate Judge. *See* Dkt. 18("R&R"). The R&R concludes that this case is moot because Petitioners have been released from ORR custody, and Petitioners cannot reasonably expect to be subjected to the challenged conduct again. Petitioners respectfully disagree.

The R&R overlooks that meaningful declaratory and prospective relief remains available notwithstanding Petitioners' release. It also incorrectly characterizes future application of the challenged custody and sponsor-vetting framework as merely "theoretical" while failing to address Respondents' actual authority and demonstrated practice of re-subjecting unaccompanied children to the same release process and re-vetting sponsors recognized by courts. Moreover, the R&R cites but never applies the voluntary-cessation doctrine to Respondents' release of Petitioners after this litigation commenced. Because effective relief remains available, the challenged conduct is capable of repetition yet evades review, and Respondents have not carried their burden to establish mootness. Therefore, the Court should reject the R&R and retain jurisdiction over this action to grant Petitioners' relief.

FACTUAL BACKGROUND

Petitioners R.M.L. and V.M.L. ("Petitioners" or "Children") are 15 and 13-year-old minors, respectively. *See* Dkt. 1 ("Petition") at ¶21. R.M.L. and V.M.L. are

sisters. *Id.* Petitioners entered ORR custody on January 22, 2026, after DHS designated them an unaccompanied child. Petition ¶ 22; *See* Dkt. 10 ("Answer") at 14. Petitioners' mother, B.L.G., first connected with ORR on January 23, 2026. Answer at 14. She sought reunification immediately after the Children entered ORR custody and participated in ORR's sponsorship process for months. Petition ¶¶ 36-43; Answer at 14-17. She complied with ORR's requests, submitted supporting documentation, and remained actively involved in the reunification process. *Id.*

On May 26, 2026, B.L.G.'s Family Reunification Packet ("FRP") was submitted to the ORR portal and the case remained pending approval of the home study. Petition ¶25. On June 3, 2026, ORR received B.L.G.'s results of her background check. Answer at 16. The June 2026 background check results did not disqualify B.L.G from sponsoring Petitioners. *Id.* On July 6, 2026, the results of the internet background check on B.L.G. were received. *Id.* On July 9, 2026, a positive home study report was received by ORR. *Id.* On July 22, 2026, DNA testing results were received by ORR, which confirmed the relationship between B.L.G. and the petitioners. *Id.*

ORR had a copy of B.L.G.'s passport on March 31, 2026. Answer at 15. Yet ORR did nothing to verify her passport for months. It was only after this litigation commenced that ORR emailed the Mexican consulate to request verification of the identification documents for B.L.G. on August 4, 2026, over four months after it received the passport. *Id.* at 15. The Mexican consulate responded to ORR's request

right away on August 5, 2026, and confirmed that the documents identified were both valid and current. *Id.* Inexplicably ORR still demanded additional identification from B.L.G. Finally, on August 11, 2026, ORR submitted a request for a category 1 waiver[1] on behalf of the sponsor because it claimed B.L.G. did not possess policy-compliant proof of identification. *Id.* Respondents held Petitioners for **212 days** before releasing them from ORR custody to their mother on August 21, 2026. *See* Dkt. 15 at 2.

PROCEDURAL HISTORY

On August 4, 2026, Petitioners filed a writ of habeas corpus under 28 U.S.C. § 2241, alleging that ORR's detention violated the Trafficking Victims Protection Reauthorization Act, 8 U.S.C. §1231, and the substantive and procedural components of the Due Process Clause. Petition at ¶¶104-34. Petitioners sought immediate release to their mother, declarations that their detention was unlawful, an injunction barring re-detention absent compliance with the requirements governing release of unaccompanied children, and fees and costs. *See Id.* at 29-30. Respondents answered on August 11, 2026. *See* Dkt. 10. Petitioners filed a traverse on August 14, 2026. *See* Dkt. 11. The Court ordered supplemental briefing. *See*

[1] On March 7, 2025, ORR Rule 2.2.4, Required Documents for Submission with the Sponsor Application for Release, was updated. Relevant here, one of those updates included changes to the list of acceptable documents to verify identity. *See* ORR Rule 2.2.4. Per ORR policy, in Category 1 cases (cases in which the sponsor is a parent or legal guardian), sponsors may request a waiver of this requirement.

Dkts. 12, 14. On August 27, 2026, Petitioners filed Petitioners' Response to Order [Dkt. 14] arguing this action remains live despite Petitioner's release. *See* Dkt. 16 at 5-8. On September 8, 2026, the Court filed a Report and Recommendation of the Magistrate Judge. ("R&R"). *See* Dkt. 18. Petitioners now submit this objection.

LEGAL STANDARD

Federal courts' power to adjudicate disputes extends only to "cases" and "controversies." U.S. Const. art. III, § 2. A case becomes moot—and therefore no longer a "case" or "controversy" for purposes of Article III—when the issues presented are no longer "live" or the parties lack a legally cognizable interest in the outcome. *Rosebrock v. Mathis*, 745 F.3d 963, 971 (9th Cir. 2014). "A defendant's voluntary cessation of allegedly unlawful conduct ordinarily does not suffice to moot a case." *Friends of the Earth, Inc. v. Laidlaw Env't Servs. (TOC), Inc.*, 120 S. Ct. 693, 700 (2000). The standard for determining whether a case has been mooted by the defendant's voluntary conduct is "stringent: A case might become moot if subsequent events make it absolutely clear that the allegedly wrongful behavior could not reasonably be expected to recur." *Id.* This requires the "defendant [to] demonstrate that 'there is no reasonable expectation that the wrong will be repeated." *United States v. W. T. Grant Co.*, 73 S. Ct. 894, 897(1953). This is a heavy burden. *Id.*

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ARGUMENT

I. THE R&R MISAPPLIES THE MOOTNESS INQUIRY BECAUSE EFFECTIVE RELIEF REMAINS AVAILABLE

The R&R concludes that this Petition is moot because Petitioners have obtained their "central request"-- release to their mother. R&R at 5. But mootness does not turn on whether Petitioners obtained part of the relief sought. A case becomes moot only when it is "impossible for a court to grant any effectual relief whatever" to the prevailing party. *Knox v. Serv. Emps. Int'l Union, Loc. 1000*, 567 U.S. 298, 307 (2012). Accordingly, a case remains live so long as the parties retain "a concrete interest, however small, in the outcome of the litigation," and the Court can still grant meaningful relief. *Id.* That reasoning applies here.

Here, Petitioners did not seek release alone. The Petition also requests declaratory relief establishing that Respondents violated the Fifth Amendment and the TVPRA by failing to promptly release Petitioners as required and holding them unlawfully without a sponsor determination for over six months, as well as prospective relief governing Respondents' future treatment of Petitioners. *See* Petition, Prayer for Relief ¶¶ 4-6. Because that relief remains available notwithstanding Petitioners' release, Respondents have not demonstrated that it is impossible for this Court to grant any effectual relief.

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A. DECLARATORY RELIEF REMAINS AVAILABLE

The R&R incorrectly concludes that declaratory relief would not resolve anything about the parties' present legal relationship because Petitioners have already been released. R&R at 7. However, Petitioners seek declarations that Respondents violated the due process requirements of the U.S. Constitution and the TVPRA for prolonging their detention for over six months and failing to comply with governing statutory and regulatory requirements requiring Petitioners' *prompt* placement with a sponsor. *See* Petition, Prayer for Relief ¶¶ 4-5. Such relief remains available notwithstanding Petitioners' release and would define the parties' legal rights and obligations under the statutory framework governing unaccompanied children. The requested declarations therefore carry present legal significance and are not merely advisory. *See Trinh v. Homan*, 333 F. Supp. 3d 984, 991 (C.D. Cal. 2018).

The R&R's conclusion overlooks *C.S.M. v. Hernandez*, No. 5:26-cv-01144-JWH-ACCV (C.D. Cal. 2026), which addressed the same circumstance presented here: an unaccompanied child's ("UC") release from ORR custody during the pendency of a habeas action after languishing in ORR custody for months with no sponsor determination. Unlike the R&R, *C.S.M.* concluded that release did not render the petition moot because declaratory and prospective relief remained available notwithstanding the petitioner's release. *See C.S.M. v. Hernandez*, No. 5:26-cv-01144-JWH-ACCV (C.D. Cal. May 13, 2026), Report and

Recommendation at 3, adopted by Order Accepting Findings and Recommendation, No. 5:26-cv-01144-JWH-ACCV (C.D. Cal. June 2, 2026). The court ultimately declared that Respondents violated the petitioner's procedural due process rights notwithstanding her release from custody. *See* Judgment, *C.S.M. v. Hernandez*, No. 5:26-cv-01144-JWH-ACCV (C.D. Cal. June 2, 2026) (granting § 2241 petition and adopting findings that ORR violated petitioner's due process rights).

That reasoning is directly applicable here. As in *C.S.M.*, Petitioners allege that Respondents unnecessarily prolonged detention despite the existence of an available family sponsor and delayed sponsorship application adjudication even after the information necessary to adjudicate release had already been obtained. *See* Dkt. 16 at 2-5. Those allegations challenge the adequacy of the procedures employed by ORR and therefore mirror the due process concerns that remained justiciable in *C.S.M.* notwithstanding the petitioner's release. *See C.S.M.*, No. 5:26-cv-01144-JWH-ACCV (C.D. Cal. June 2, 2026), Report and Recommendation at 6-9; *see also Trinh* (recognizing that a habeas petition remains a live controversy after release where petitioners retain a concrete interest in relief because they remain subject to future detention.) 333 F. Supp. 3d at 991. Accordingly, neither *C.S.M.* nor *Trinh* supports the conclusion that Petitioners' release categorically forecloses declaratory relief.[2]

[2] Petitioners cited *Super Tire Eng'g Co. v. McCorkle* and *Knox* for the governing mootness principles, not because their facts are akin to those presented here. The factual distinctions

B. PROSPECTIVE RELIEF REMAINS AVAILABLE

Petitioners also seek prospective protection against the recurrence of the same conduct that gave rise to this action: ORR's failure to vet a sponsor and promptly release Petitioners in violation of the TVPRA, ORR regulations, and due process requirements. *See* Petition, Prayer for Relief ¶ 6. The R&R acknowledges this request but does not meaningfully analyze whether such relief remains available. R&R at 2. Instead, it reasons that Petitioners' release alone ended the controversy. That is not the governing inquiry under *Knox*.

Instructive here, *C.S.M.* rejected that same reasoning. There, even after the petitioner's release, the court recognized that prospective relief retained practical significance because the petitioner remained in immigration proceedings and continued to be subject to the statutory framework governing unaccompanied children, including ORR's placements and vetting decisions. *See C.S.M.*, No. 5:26-cv-01144-JWH-ACCV, Report and Recommendation at 3. The court ultimately recommended issuance of a writ prohibiting future re-detention absent compliance with procedural protections and applicable regulations. *Id.* at 9. Thus, *C.S.M.* did not merely recognize that prospective relief was theoretically available; it granted such relief. *Id.* The same result is warranted here.

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identified in the R&R therefore do not materially undermine Petitioners' reliance on those authorities. Nor does the R&R address the more analogous analysis adopted in *C.S.M.*

Prospective relief would continue to govern the parties' legal relationship and provide meaningful protection against future violations. Because such relief remains available, the Court may grant effectual relief and this action is not moot.

II. MULTIPLE EXCEPTIONS TO THE MOOTNESS DOCTRINE APPLY

The R&R incorrectly concludes that no exceptions to the mootness doctrine apply here. That is not correct.

A. THE R&R INCORRECTLY CONCLUDES THAT PETITIONERS CANNOT REASONABLY EXPECT TO BE SUBJECT TO THE CHALLENGED CONDUCT AGAIN

Petitioners object to the R&R's conclusion that the capable-of-repetition-yet-evading-review exception does not apply. The R&R concludes that Petitioners have not shown they will reasonably be subject to the same action again and incorrectly frames Respondents' ability to resubject Petitioners to the same unlawful detention and sponsor vetting process as a "theoretical possibility." R&R at 8. That conclusion rests on a misunderstanding of both Respondents' authority over UCs and the practical reality of how that authority is exercised. The possibility that Petitioners could again be subjected to the challenged ORR custody and sponsor-adjudication processes is not speculative. Respondents have authority to re-detain UCs and to re-vet sponsors, and courts have recognized, that Respondents *have* used that authority to subject previously released children to renewed periods of detention and re-violate their due process rights.

A case is not moot where "(1) the challenged action is in its duration too short to be fully litigated prior to cessation or expiration, and (2) there is a reasonable expectation that the same complaining party will be subjected to the same action again." *Spencer v. Kemna*, 523 U.S. 1, 17 (1998).

The first element is satisfied here. Petitioners challenge prolonged detention while ORR adjudicates a sponsor application. That detention ends once ORR releases the child, often before judicial review can be completed. Indeed, that is precisely what occurred here.

The dispute centers on the second element. Contrary to the R&R's conclusion, Petitioners' future exposure to the challenged conduct is not theoretical. Petitioners remain unaccompanied children in ongoing immigration proceedings and therefore remain subject to the same statutory and regulatory framework governing ORR custody, placement, and sponsor adjudications. Moreover, both recent litigation and Ninth Circuit authority demonstrate that released UCs have in fact returned to ORR custody and been subjected to renewed sponsor review for the same sponsor. The R&R's contrary conclusion cannot be reconciled with either the governing statutory framework or the relevant case law.

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1. RESPONDENTS RETAIN AUTHORITY OVER FUTURE CUSTODY, PLACEMENT, AND SPONSOR DETERMINATIONS

The R&R's capable-of-repetition analysis rests on a mistaken premise. The R&R reasons that 6 U.S.C. § 279 and 8 U.S.C. § 1232 do not provide a mechanism by which ORR may "retake" a child after release and therefore concludes that future application of the challenged conduct is merely "theoretical." R&R at 6, 8. But Petitioners do not challenge ORR's authority to apprehend or arrest children, because ORR does not have such authority. Nor did ORR exercise such authority when Petitioners first entered its custody. Petitioners challenge ORR's exercise of its statutory authority to hold unaccompanied children in its custody for prolonged periods of time, and its failure to vet sponsors or make placement determinations or issue release adjudications. The relevant question is therefore not whether ORR may independently seize Petitioners (it never could), but whether Petitioners may again become subject to the same ORR's custody and release processes challenged in this action. They may.

Under the Homeland Security Act and the TVPRA, the federal government retains continuing authority over unaccompanied children while their immigration proceedings remain pending. See 6 U.S.C. § 279(a), (b)(1); 8 U.S.C. § 1232(b)(3), (c). Petitioners remain designated as unaccompanied children and remain in removal proceedings. As a result, they continue to be subject to the same statutory and

regulatory framework governing ORR custody, placement, release, and sponsor-adjudication decisions that governed Respondents' treatment of them in this case.

The challenged conduct here was not Petitioners' initial apprehension conducted by DHS. Petition ¶ 22. Rather, it was Respondents' administration of the ORR release process, including sponsor-vetting, placement determinations, and prolonged detention while Petitioners' mother's sponsorship application remained pending that began when Petitioners entered ORR custody on January 22, 2026. While their immigration proceedings remain ongoing, Petitioners may again enter ORR custody, where it will exercise the same authority over custody, placement, sponsor adjudication, and release that Petitioners challenge here. The possibility that Petitioners may again be subjected to that framework is therefore not speculative.

Notably, the court in *C.S.M. v. Hernandez* rejected a nearly identical mootness argument made by the government in a UC habeas case involving prolonged ORR detention where the petitioner had been released from ORR custody after litigation commenced. *See C.S.M.*, No. 5:26-cv-01144-JWH-ACCV (C.D. Cal. June 2, 2026), Report and Recommendation at 5-9. There, the court recognized that release did not eliminate the petitioner's exposure to the statutory framework governing unaccompanied children because the petitioner remained in immigration proceedings and continued to be subject to ORR's custody and release regime should she return to ORR custody. *Id.* at 5. The same is true here.

Like the petitioner in *C.S.M.*, here Petitioners remain in ongoing immigration proceedings and continue to be designated an UCs. As a result, they remain subject to the federal statutory scheme governing the care and custody of UCs, including Respondents' authority over placement, sponsor vetting, transfer, and custody determinations while those proceedings are pending.

Accordingly, the R&R's focus on whether ORR may independently "retake" Petitioners misses the point. The relevant inquiry is whether Petitioners may again become subject to the same ORR prolonged release decision-making framework challenged in this action. Because they remain UCs in ongoing immigration proceedings and remain subject to that framework, the answer is yes.

2. RESPONDENTS HAVE EXERCISED THEIR AUTHORITY TO RE-DETAIN CHILDREN AND RE-VET PREVIOUSLY APPROVED SPONSORS

The R&R further characterizes Petitioner's future exposure to the challenged conduct as merely a "theoretical possibility." R&R at 8. However, courts have confronted the very circumstances the R&R deems speculative.

In *M.A. v. Molina*, an unaccompanied child was released to his mother after ORR approved her as a sponsor. No. 4:26-cv-00415, 2026 WL 741623 (N.D. Ohio Mar. 17, 2026). He was later returned to ORR custody and held for months while ORR reassessed the suitability of that *same* previously approved sponsor. *Id.* The court ultimately ordered his release after concluding that ORR's prolonged delays violated due process. *Id.* Thus, *M.A.* involved the precise recurrence the R&R

dismisses as speculative: a UC released to an approved pare-sponsor, returned to ORR custody, and subjected to renewed sponsor adjudication, and prolonged, unlawful detention.

Likewise, in *Saravia v. Sessions*, the Ninth Circuit upheld relief addressing circumstances in which minors who had previously been released to sponsors were later re-arrested and returned to restrictive custody. 905 F.3d 1137, 1145-48 (9th Cir. 2018). *Saravia* confirms that children released from ORR custody remain subject to the federal custody and placement framework governing UCs.

C.S.M. is especially instructive here. There, the court rejected Respondents' contention that release rendered the petition moot and concluded that the petitioner continued to face the possibility of future detention and return to ORR custody while immigration proceedings remained pending. *C.S.M.*, No. 5:26-cv-01144-JWH-ACCV (C.D. Cal. June 2, 2026), Report and Recommendation at 5. The court therefore found the controversy remained live notwithstanding the petitioner's release.

These cases are significant because they demonstrate that the recurrence identified by Petitioners is not hypothetical. UCs previously released to approved sponsors have, in fact, been returned to ORR custody and subjected to renewed

sponsor vetting and release determinations.[3] The precise sequence of events that Petitioners challenge and seek prospective relief to prevent is already occurring.

Nothing in the record establishes that Petitioners could not again be subjected to the same custody, sponsor-vetting, and release processes challenged here. Because Respondents retain the authority to administer that framework and have exercised that authority in comparable circumstances, Petitioners have established a reasonable expectation that they may be subjected to the challenged conduct again. The capable-of-repetition-yet-evading-review exception therefore applies, and the R&R's contrary conclusion should be rejected.

B. THE R&R FAILS TO HOLD RESPONDENTS TO THEIR BURDEN ON VOLUNTARY CESSATION

The R&R cites the voluntary cessation standard but never applies it to the facts of this case. *See* R&R at 5. Instead, it concludes that Petitioners' release mooted this action without addressing the critical fact that Respondents released Petitioners *only after* this litigation was filed. Because Respondents' allegedly unlawful conduct ceased after the commencement of suit, the voluntary cessation doctrine applies.

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[3] The government's own representations in other litigation confirm that return to ORR custody is not merely theoretical. During a preliminary injunction hearing in *Diego N. v. HHS*, government counsel represented that ORR believed approximately 500 unaccompanied children were re-referred to ORR custody between January 2025 and March 2026. See *Diego N. v. HHS*, No. 1:26-cv-577 (D.D.C. Mar. 24, 2026), Hr'g Tr. at 63. That figure further undermines the R&R's characterization of future exposure to the challenged ORR custody and release framework as merely speculative.

"A defendant's voluntary cessation of allegedly unlawful conduct ordinarily does not suffice to moot a case." *Friends of the Earth, Inc. v. Laidlaw Env't Servs. (TOC), Inc.*, 528 U.S. 167, 174 (2000). Otherwise, "a defendant could engage in unlawful conduct, stop when sued to have the case declared moot, then pick up where he left off." *Already, LLC*, 568 U.S. at 91 A defendant's voluntary cessation of a challenged practice does not deprive a federal court of its power to determine the legality of the practice. *City of Mesquite v. Aladdin's Castle, Inc.*, 455 U.S. 283, 289 (1982). Accordingly, Respondents bear the "formidable burden" of demonstrating that it is "absolutely clear that the allegedly wrongful behavior could not reasonably be expected to recur." *Friends of the Earth*, 528 U.S. at 190.

Here, Petitioners languished in ORR custody for more than six months while Respondents delayed adjudication of their mother's sponsorship application. Petition ¶ 22; Dkt. 15 at 2. Petitioners filed this action seeking release and other relief on August 4, 2026. Petition at ¶¶104-34. Only *after* litigation commenced did Respondents release Petitioners to their mother on August 21, 2026. *See* Dkt. 15 at 2. Because Respondents ended the challenged conduct after suit was filed, they bear the burden of establishing mootness.

The R&R never meaningfully addresses whether Respondents carried that burden. That omission is significant because Respondents retain authority over UCs who remain in immigration proceedings, including authority affecting future custody, placement, and sponsor determinations. *See* 6 U.S.C. § 279; 8 U.S.C. §

1232. That Respondents may subject Petitioners to repeat custody and sponsor-vetting in the future is likely not merely theoretical. As discussed above, courts have repeatedly addressed circumstances in which children previously released to approved sponsors were returned to ORR custody and subjected to renewed sponsor review. *See C.S.M.,* No. 5:26-cv-01144-JWH-ACCV; *M.A.,* 2026 WL 741623; *Saravia,* 905 F.3d at 1137. At a minimum, these authorities foreclose any argument that it is "absolutely clear" the challenged conduct could not reasonably recur.

Instead, the R&R effectively shifts the burden to Petitioners to establish future recurrence of the challenged conduct. R&R at 8. But that is not the inquiry under voluntary cessation. The relevant question is whether Respondents established that recurrence of the challenged conduct is impossible. Respondents cannot carry that burden under governing case law. Nor does the record contain any such showing. Respondents therefore failed to carry their burden, and the R&R's contrary conclusion should be rejected.

C. THE R&R APPEARS TO CONFLATE COLLATERAL CONSEQUENCES WITH THE EXISTENCE OF A LIVE CONTROVERSY

The R&R concludes that Petitioners identify no redressable "continuing" consequence following their release. R&R at 5-6. To the extent the R&R treats the absence of continuing consequences as dispositive, it applies the wrong mootness inquiry. A case becomes moot only when it is "impossible for a court to grant any effectual relief whatever" to the prevailing party. *Knox,* 567 U.S. at 307. Thus,

collateral consequences, not "continuing consequences," are one means by which a case may remain live after release; they are not a prerequisite to Article III jurisdiction.

The Ninth Circuit has recognized that a habeas petition may remain justiciable where collateral consequences persist after release. *Abdala v. INS*, 488 F.3d 1061, 1064 (9th Cir. 2007). But Petitioners are not required to establish collateral consequences to defeat mootness where, as discussed above, declaratory, and prospective relief remain available, and the challenged conduct is capable of repetition yet evading review. *See Knox*, 567 U.S. at 307.

Accordingly, the absence of a continuing custodial relationship with ORR does not resolve the mootness inquiry. The relevant question is whether effective relief remains available and whether the controversy otherwise remains live under established mootness principles. For the reasons discussed above, both questions must be answered in the affirmative.

CONCLUSION

For the foregoing reasons, Petitioners respectfully request that the Court reject the Report and Recommendation, hold that the Petition is not moot, retain jurisdiction over this matter, and proceed to adjudicate Petitioners' claims under the TVPRA and the Due Process Clause.

Dated: September 22, 2026

Respectfully Submitted,

/s/Stephanie Periban Palacios
Stephanie Periban Palacios
Attorney for Petitioner