

UNITED STATES DISTRICT COURT
for the Southern District of Florida

HURIYAT MAMAJONOVA)

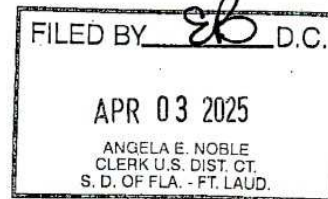
Petitioner)

v.)

GARRETT RIPA, *et al.*)

Respondents)

CASE NUMBER
0:25-cv-60242-DMM



PETITIONER'S REPLY TO GOVERNMENT'S RESPONSE

On February 12, 2024 the Petitioner filed a "Declaration Under Penalty of Perjury" stating the facts upon which all of her claims for relief were based. *See ECF DE 1, p.10.* In support of her claims Petitioner also filed a forty page brief (also known as a memorandum of law) showing several reasons why her deportation case should be terminated and as a result she should be released from detention. *Ibid, MTT.*

On the same day, the Court ordered the Respondents "to file a Memorandum of Fact and Law to show cause why this Petition should not be granted and ... necessary documents for the resolution of the Petition." *See ECF DE 6.*

Respondents have woefully failed to comply with any of the above requirements in that their response does not contain either the Statement of Facts or the Memorandum of Law in substance and in form, while the information and documents Respondents submitted in support thereof do not address let alone resolve most of factual issues that Petitioner presented in her sworn statement.

Rather, in their informational part of the response, the Respondents attempt to present their own “[b]ackground” story that is neither based on facts nor admissible evidence, *see* ECF DE 12, pp.1-3, while their “[a]rgument” is certainly inapplicable to the facts presented in the Petitioner’s sworn statement.

Most importantly, the Respondents failed to acknowledge, let alone comply with, the Petitioner’s discovery request, which production would prove the time and place of the Petitioner’s entry into the country, as she alleged in her sworn statement, *beyond a reasonable doubt*. *See Attachment 4 below*.

For the reasons stated below, the Court should DISREGARD the Respondents story in its entirety, except for that part where the Respondents acknowledge that Petitioner “appeared at a St John, VI CBP office on November 13, 2024 at 1630 hrs” or words to that effect and SANCTION them for failing to comply with its Order and the discovery request in the form of drawing favorable inference with respect to all facts the Petitioner’s alleged in her sworn statement, which the Court should do anyway, in accordance with its procedural law.

I. ABSTRACT.

"Is it fair or reasonable for ... the United States to invite refugees ... to this country and then detain one of them .. in a ... federal prison on the sole ground that [s]he, like [thousand other] refugees who are now free on parole, arrived without proper entry papers? The answer is *no*. It is neither fair, reasonable nor humane. Can this Court do anything about it?" This Court should conclude that it can. *See Soroa-Gonzales v. Civiletti*, 515 F. Supp. 1049, 1051 - Dist. Court, ND Georgia 1981.

II. PROCEDURAL LAW.

1. In a preamble of their response, the Respondents requested for the Court to "deny" the Petitioner any relief on the merits of her claims. Such a request is an equivalent of a motion for summary judgment, because it does not raise any jurisdictional issue or does not genuinely dispute any material fact. *See e.g. Ferrer v. Atlas Piles, LLC* - 586 F. Supp. 3d 1286, 1291 - Dist. Court, SD Florida 2022 "Summary judgment can be entered on a claim only if it is shown "that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law." *See also Deary v. Progressive American Ins. Co.*- 536 F. Supp. 3d 1258, 1265 - Dist. Court, SD Florida 2021.

2. "A district court considering a motion for summary judgment is required to construe the facts of the case in the light most favorable to the non-moving party. See *Anderson v. Liberty Lobby*, 477 U.S. 242, 255 (1986) (The "evidence of the nonmovant is to be believed, and all justifiable inferences are to be drawn in his favor"). "As a general principle, Rule 56 of the Federal Rules of Civil Procedure, relating to summary judgment, applies with equal force in the context of habeas corpus cases." *Clark v. Johnson*, 202 F.3d 760, 764 (5th Cir. 2000). This principle is limited, however; Rule 56 applies insofar as it is consistent with established habeas practice and procedure. See *Smith v. Cockrell*, 311 F.3d 661, 668 (5th Cir. 2002) " See also *David Lee Ballard v. Lorie Davis* - Case 4:16-CV-2429 - District Court, Southern District of Texas, 2017 ECF DE 20, p.4 .

3. "District courts may disregard "sham affidavits" when evaluating summary judgment motions. *Van T. Junkins & Assocs., Inc. v. U.S. Indus., Inc.*, 736 F.2d 656 (11th Cir. 1984)... The Eleventh Circuit has held that "a district court may find an affidavit which contradicts deposition testimony a sham when the party merely contradicts its prior testimony without giving any valid explanation. *Van T. Junkins*, 736 F.2d at 656. "When a party has given clear answers to unambiguous questions which negate the existence of any genuine issue of material fact, that party cannot thereafter create such an issue with an affidavit that merely contradicts, without explanation, previously given testimony." See also *Venerio v. Federal Express Corporation*- Case No. 17-22624-CV-SCOLA/TORRES- Dist. Court, SD Florida, 2018.

4. Form I-867A contains "sufficient indicia of reliability to permit the BIA and us to consider ..interviews because the interviews were conducted under oath, with contemporaneous notes containing the questions asked, and transcribed ... with the aid of an interpreter. *See Singh v. Gonzales* - 403 F.3d 1081, 1089 - Court of Appeals, 9th Circuit, 2005. *See also Mukulumbutu v. Barr*, 977 F. 3d 924, 926 - Court of Appeals, 9th Circuit, 2020.

5. However, "in evaluating inconsistencies, the relevant circumstances that [a judge] should consider include the petitioner's explanation for a perceived inconsistency, *see Soto-Olarte*, 555 F.3d at 1091, and other record evidence that sheds light on whether there is in fact an inconsistency at all. To ignore a petitioner's explanation for a perceived inconsistency and relevant record evidence would be to make a credibility determination on less than the total circumstances in contravention of the REAL ID Act's text." *See Shrestha v. Holder* - 590 F. 3d 1034, 1044 - Court of Appeals, 9th Circuit, 2010.

6. "Under Federal Rule of Civil Procedure 56(c)(2), "[a] party may object that the material cited to support or dispute a fact cannot be presented in a form that would be admissible in evidence." Inadmissible hearsay cannot be presented on a motion for summary judgment, except that "otherwise admissible evidence may be `submitted in inadmissible form at the summary judgment stage, though at trial it must be submitted in admissible form.'" *McCaskill v. Ray* - 279 F. App'x 913, 914 (11th Cir. 2008). *See also Stolinis v. Palmer* - 512 F. Supp. 3d 1264, 1267 - Dist. Court, MD Florida, 2021.

III. ARGUMENT.

1. The Respondents Introduced Sham Evidence.

In their background story, the Respondents assert that “Petitioner conceded that she entered the United States without inspection” by relying on “Exhibit A, I-213”, which “*stated* that she came into the United States without inspection on November 12, 2024 from Barbados to the United States Virgin Islands”. See ECF DE 12, pp.1-3 and compare to ECF DE 12-1, Form I-213, p.3

The latter statement contradicts the Record of Sworn Statement, that the same CBP Officer Small prepared, where the Petitioner answered “Yes” to the question “When you arrived in the USVI did you present yourselves to U.S. Customs and Border Protection”. See ECF DE 1, MTT, Form I-867A, page 4 of 6,

The I-213 further states that the Respondent “was aware that her manner of entry into the United States was illegal”, which contradicts the I-267A, where the Petitioner answered “No” to the question “Are you aware that you are in the country illegally”. *Ibid*, page 5 of 6. See also Attachment 1 below.

With respect to the date of her arrival, the officer calculated it by deducting “about four days” from November 17, 2024,¹ that is the day of that part of the report, and concluding “that would be about Tuesday November 12, 2024”, *ibid*, which is incorrect because that would actually be November 13, 2024, which the Petitioner later corrected in all of her statements, including the instant Petition. See ECF DE 1. See also Attachments 2 and 3 below.

¹ See also the Respondents explanation regarding that date in their footnote 2.

2.The Respondents Presented Inadmissible Hearsay.

In their background story, the Respondents also assert that “Petitioner was advised that she was not admitted or paroled at the St. John, VI CBP office on November 13, [sic] 2025” by relying on a declaration made by CBP Officer Shawn Brady. In that declaration Officer Brady stated that the Respondent “were advised and were not legally admitted or paroled by CBP OFO at this time”. See ECF DE 12-7, p.3 of 4.

“As an initial matter, the declaration contains “[h]earsay within hearsay, or so-called ‘double-hearsay,’” and, therefore, “is admissible only if each part of the combined statements conforms with an exception to the hearsay rule.” *United States v. Robinson*- 239 F. App’x 507, 508 (11th Cir. 2007).” See also *Parker v. US Attorney General* - Case No. 23-cv-21388-BLOOM - District Court, Southern District of Florida, 2025.

The first level of hearsay is the declaration itself: it contains out of court statements made by Officer Shawn Brady offered for the truth of those statements. The second level of hearsay is the statement that was apparently made by another CBP OFO officer, which is the only portion of the declaration that addresses the Petitioner’s legal admission and the advice she allegedly received from him. Respondents do not point to any portion of the declaration in which Brady states that he personally has any knowledge of the results of the Petitioner’s inspection and the advice that she received from her inspector. “Therefore, the declaration is inadmissible.” *Ibid.*

3. Respondents Argument Is Based On Legal Fictions.

In their Argument, the Respondents claim that "Petitioner is an "applicant for admission" under § 1225(a)(1), and as such is not entitled to any procedures beyond those prescribed by the expedited removal statute, which have been followed. Under the expedited removal statute, in the event that an immigration officer determines that an alien is inadmissible, the officer shall order the alien removed from the United States without further hearing or review, stripping the court of jurisdiction over the writ of habeas corpus." See ECF DE 1, page 3.

As Petitioner extensively argued in her MTT, "the INA defines "[t]he terms 'admission' and 'admitted' [to] mean, with respect to an alien, the lawful entry of the alien into the United States after inspection and authorization by an immigration officer." INA § 101(a)(13)(A), 8 U.S.C. § 1101(a)(13)(A).... Each component of this definition points towards admission as requiring a physical act. Start with "lawful entry." Before IIRIRA, the INA defined "entry" as "any coming of an alien into the United States, from a foreign port or place or from an outlying possession, whether voluntarily or otherwise[.]" INA § 101(a)(13) (1988); 8 U.S.C. § 1101(a)(13) (1988). Although IIRIRA replaced "entry" with "admission, "entry" remains a "term of art requiring not only physical presence in the United States but also freedom from official restraint." United States v. Arqueta-Rosales, 819 F.3d 1149, 1158 (9th Cir. 2016). See also Singh v. US Attorney General - 12 F. 4th 262, 281 - Court of Appeals, 3rd Circuit, 2021.

The Respondents concede that Petitioner “appeared at a St John, VI CBP office on November 13, 2024 at 1630 hrs”, see ECF DE 12-7, Brady Declaration p.3 of 4, which took place twenty minutes past her arrival at the port of entry. See Attachment 2 (a photo showing its time and date). See also ECF 1-2, MTT, Exhibits A-D showing where that photo was taken.

However, the Respondents do not claim that the Petitioner was either physically or legally restrained from leaving that office. In fact, the Respondents “suggested that the subjects go to the US Citizenship and Immigration Service (CIS) office the next morning”, see Brady Declaration, *supra*, which they did. See ECF 1-2, MTT, Exhibits H, G.

Therefore, the Respondents whole Argument claiming that the Petitioner is *an applicant for admission* is an “entry fiction” that “applies to a specific class of aliens who have not yet physically entered the United States and who are subject to exclusion proceedings.” See *Kay v. Reno*- 94 F. Supp. 2d 546, 555 - Dist. Court, MD Pennsylvania, 2000.

Respondents, just like “*Ho* essentially extends this fiction to all excludable and deportable aliens and declares that they are entitled to lower due process rights”. *Ibid*. This Court should find such reasoning counterintuitive; instead the Court should agree “with the dissenting opinion in *Ho* which explains:

Close analysis reveals that the majority's treatment of Petitioners' constitutional claims is supported only by a tenuous foundation of legal fiction stacked upon legal fiction.” *Ibid*.

Indeed, in order to properly characterize the Petitioner as alien seeking admission and thereby justify the issuance of the expedited removal order, the Respondents must prove that the Petitioner was *not* free to leave the Saint John, VI CBP office on November 13, 2024. *See Singh, supra*.

Having made that leap, the Respondents adopt the "entry fiction" applied in admission cases so as to characterize immigrants who are physically present within United States borders pending a determination of their asylum application "as never having effected entry into this country and therefore not entitled to due process protection. *See Plasencia, 459 U.S. at 32-33, 103 S.Ct. 321.*" *Kay, supra*.

Compounding these fictions is the Respondents "unsupported conclusion that while Petitioners resided² in the United States they may have enjoyed some form of "heightened" constitutional status that could be stripped away upon the issuance of a removal order." *Ibid*.

Finally, to avoid the constitutional prohibition against imprisonment for purposes other than punishment, the Respondents, just like *Ho* "majority employs the fiction that detention is merely an extension of the exclusion proceedings, and therefore within the plenary power of the executive and legislative branches to govern immigration matters." *Ibid*.

² *See ECF 1-2, MTT, Exhibit E.*

The Court should agree “with Judge Brorby that creation of these additional fictions and application of them to reduce [an] alien's substantive due process rights are in direct conflict with Supreme Court decisions holding that aliens are “persons” guaranteed due process of law by the Fifth and Fourteenth Amendments.” *Ibid.*

In their argument, Respondents further claim that “detention of an alien subject to the expedited removal statute while her asylum application is being adjudicated, is statutorily mandated, even if an asylum officer determines the alien has a credible fear of persecution. *See* 8 U.S.C. § 1225(b)(1)(B)(ii); *Jennings*, 138 S.Ct. at 842 (finding the “clear language” of section 1225(b)(1) mandates detention of aliens claiming a credible fear of persecution). *See ECF DE 1, page 9.*

“This reasoning is a classic example of a straw man argument, i.e. a logical fallacy that involves refuting a position which is different from the one being asserted, and it is without merit.” *See TSI Technologies, LLC v. CFS Brands, LLC*, Civil Action No. 23-1011-KHV -Dist. Court, D. Kansas 2024

In *Jennings* “respondent Alejandro Rodriguez, a Mexican citizen and a lawful permanent resident of the United States, was detained pursuant to § 1226 while the Government sought to remove him. In May 2007, while still litigating his removal, Rodriguez filed a habeas petition, claiming that he was entitled to a bond hearing to determine whether his continued detention was justified.” *See Jennings v. Rodriguez* -583 US 281, 833 - Supreme Court, 2018.

Here, Petitioner was neither detained “pursuant to § 1226” nor claimed that she was entitled to a bond hearing, because a simple remedy for violation of law is placing the Petitioner in her previous status had the violation never occurred, *see IJ decision at ECF DE 1-2, see also Soroa-Gonzalez, ante*, nor did Petitioner ask this Court to determine if her continued detention was justified. In fact, the Respondents acknowledge in the same paragraph that Petitioner was detained pursuant to § 1225(b) and that she did not appeal a bond related decision of the immigration judge to the BIA in their footnote 3, which makes her case distinguishable from that of *Jennings* and their argument to be that of a “straw man”.

The Respondents further asserts that “the Supreme Court addressed aliens’ due process rights in the context of the expedited removal statute in *Thuraissigiam v. U.S. Dep’t of Homeland Sec.*, 591 U.S. 103, 140 S. Ct. 1959 (2020). Thuraissigiam entered the United States without permission and immigration authorities apprehended him twenty-five yards from the border.”

It should be noted that “Respondent Vijayakumar Thuraissigiam ... was stopped just 25 yards after crossing the southern border without inspection or an entry document. He was detained for expedited removal. An asylum officer rejected his credible-fear claim, a supervising officer agreed, and an Immigration Judge affirmed. Respondent then filed a federal habeas petition, asserting for the first time a fear of persecution based on his Tamil ethnicity and political views and requesting a new opportunity to apply for asylum”. *Id* at 1961.

Here, the Petitioner neither crossed the border without inspection nor was detained after such crossing nor requested a new opportunity to apply for asylum. In fact, there was no border for her to “cross” at the sea (hence is a true reason³ why the CBP OFO decided to release her on November 13, 2024, in other words, there was no probable cause for her detention) and she passed her credible fear interview without a problem. Therefore, that argument is also a “straw man”.

Finally, the Respondents assert that “Petition seeks release, but also seeks damages, injunctive, and declaratory relief that is not available in a habeas proceeding”. However, the Petitioner did not seek other relief pursuant to habeas statute. Rather, she claimed them on the habeas petition in order to place Respondents on notice of all of her claims. In fact, the Court’s form AO 242 that she filled out expressly prohibited her to “cite cases or law” therein. Therefore, Petitioner decided to do that later, which she did in her Motion for Appointment of Counsel by citing *Sosa* and *Al Odah* cases, which allowed those petitioners to make their claims pursuant to an Alien Tort Statute. See ECF DE 9

³ In his declaration, Officer Brady provided his reasoning for the CBP OFO’s decision not to detain the Petitioner “[d]ue to CBP operational constraints, including the lack of detention capability, detainee necessities”, which bears unknown relationship to that of CBP OFO itself and therefore “consists primarily of impermissible *post hoc* rationalization.” See *Department of Homeland Security v. Regents of University of California* - 140 S. Ct. 1891, 1898 - Supreme Court, 2020.

WHEREFORE, the Court should find the Petitioner's confinement to be contrary to law and issue the writ of habeas corpus to the Petitioner under the terms it deems appropriate. *See Soroa-Gonzales, supra* at 1061.

Respectfully submitted by

Huriyat Mamajonova
HURIYAT MAMAJONOVA

CERTIFICATE OF SERVICE.

I, the undersigned, certify that I served or caused to be served the foregoing reply by emailing its copy to the following recipient on April 3, 2024. I also certify that I served or caused to be served the Respondents with my discovery request by mailing its copy to the following recipient on or about March 10, 2025⁴ and I have not received any response from him as of today.

Brett R. Geiger
ASSISTANT U.S. ATTORNEY
Court No. 5502622
E-mail: Bertt.Geriger@usdoj.gov
99 N.E. 4th Street, Suite 300
Miami, Florida 33132
Telephone: (305) 961-9190
Counsel for Respondents.

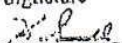
Respectfully submitted by

Huriyat Mamajonova
HURIYAT MAMAJONOVA

⁴ See USPS tracking number 9114901230803061215048.

U.S. Department of Homeland Security

Continuation Page for Form I-667A

Alien's Name NANAJONOVA, HURİYAT KANCHINDOEVNA	File Number SIGMA	Date November 17, 2024
Event		
Q. So what is it a common law marriage? A. No Q. Are you planning to get married here? A. Yes Q. Do you have any children? A. No. Q. Do you have any immediate family members who are lawful permanent residents of the United States or United States citizens? A. My husband is a citizen. Q. Are you legally married in Uzbekistan? A. No Q. Do you claim to be a lawful permanent resident of the United States or a United States citizen? A. No. Q. Do you have any reason to believe that you are a lawful permanent resident of the United States United States Citizen or a United States citizen? A. No. Q. What was your purpose for coming today? A. I came to be with my husband. Q. How did you get to the United States Virgin Islands? A. By the airplane and then by the boat. Q. Where did you come from when you came by plane? A. I came from Uzbekistan to Turkey, Turkey to Germany and from Germany to Barbados. Q. How did you get from Barbados to here? A. I came on a cruise. Q. What kind of Cruise was it? What was the name of the ship? A. The name of the ship was ARVA. Q. Where did ARVA take you to? A. I don't know the name. My husband arranged everything. Q. Was your husband with you? A. Yes Q. He was with you the whole way? A. No we met with him in Turkey, we toured around and then we came. Q. What is your husband's name? A. Rakmatulla Aevdov Q. When did you arrive in the United States Virgin Islands? A. It's been about four days. ... (CONTINUED ON NEXT PAGE)		
Signature 		Title CIB OFFICER
Special Agent in Charge SMALL, JR., Kenneth H		

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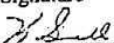
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3 of 6 Pages

U.S. Department of Homeland Security

Continuation Page for Form I-867A

Alien's Name MAMAJONOVA, HURIYAT KAMCHINBOEVNA	File Number SIGMA 	Date November 17, 2024
Q. So that would be about Tuesday November 12, 2024? A. Yes Q. Did you arrive at in the daytime or nighttime? A. It was about 3:00pm Q. Was it the boat ARVA that brought you to the Virgin Islands? A. Yes Q. Is ARVA a very big boat? A. Yes Q. Did you come to the USVI on a big boat or a small one? A. We came with the big one and then we used the small one. Q. Can you describe the small boat? A. Only three or four people would fit for the small one. Q. What color was it? A. White Q. Do you remember how the captain looked? A. No I did not look at his face. Q. How much in total did you pay to go from Uzbekistan to the USVI? A. I don't know. Q. Do you have any of the details of the trip or did your husband handle everything? A. My husband did everything. Q. What island were you on before you came to the USVI? A. I don't know. Q. Why didn't you go back to ARVA? A. We had to come to the United States. Q. Who else was with you besides your husband? A. A guy who came with us Davronbek. Q. Is he related to you or your husband? A. He's my husband's friend. Q. Did your husband arrange the entire trip? A. Yes. I don't speak English so he's the one that did it. Q. When you arrived in the USVI did you present yourselves to U.S. Customs and Border Protection? A. Yes Q. What did they tell you? A. They asked for our passports and told us to walk through so that we could do fingerprints. ... (CONTINUED ON NEXT PAGE)		
Signature  SHALL, JR., Kenneth N.		Title CBP OFFICER

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4 of 6 Pages

U.S. Department of Homeland Security

Continuation Page for Form I-867A

Alien's Name MAMAJONOVA, HURIYAT KANCHINBOEVNA	File Number SIGMA Eve Event No:	Date November 17, 2024
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Q. Did the officers at U.S. Customs and Border Protection inform you that you were illegal in the United States?

A. They spoke to my husband, I don't know much.

Q. Are you aware that you are in the country illegally?

A. No I don't know

Q. What are your intentions in the United States?

A. To live here with my husband.

Q. Did you work in Uzbekistan?

A. Yes I did.

Q. What did you do for work?

A. I made desserts in a bakery.

Q. Have you ever worked for the Uzbekistan government?

A. No

Q. Have you ever been a part of the Uzbekistan military?

A. No

Q. Have you ever been to the United States before?

A. No

Q. Have you ever been arrested or convicted for an offense or crime anywhere in the world?

A. No.

Q. Have you ever appeared before a judge in a court of justice anywhere in the world?

A. No.

Q. Have you ever been previously removed from the United States?

A. No.

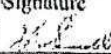
Q. You appear to be inadmissible to the United States pursuant to sections 212(a) (7) (A) (i) (I) of the INA for being an Immigrant without a valid Immigrant Visa. You will be detained by the Department of Homeland Security until a decision can be made in your case. Do you understand?

A. Yes

Q. Do you have any statements you would like to make at this time?

A. Can you let me go?

A. No

Signature 	Title CBP OFFICER
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Digitally Acquired Signature:

HKM

5 of 6 Pages

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To: Arvia <Arvia@pocruises.com>

Subject: P&O Cruises | Arvia | 11/08/24 - 11/22/24: Conf #XV3MHK & #XH2LMP - Updated with cabin numbers.

Please acknowledge you received this message. I did not include the cabin numbers. See below.

Vacations To Go
ABTA #000CU167

The following passengers notified Mr. Nathaniel Turley, Master Cruise Counselor, they had to leave the ship early due to work related issues. They exited the ship on Wednesday, November 13, 2024 in Tortola, British Virgin Islands. Additionally, they stated they will not return to the ship.

Conf #XV3MHK Booked Cabin [REDACTED]

Mr. Rakhmatulla Asatov ([REDACTED] 53) United States Cell: + [REDACTED]

Ms. Huriyat Mamajonova ([REDACTED] 36) Uzbekistan

Conf #XH2LMP Booked Cabin [REDACTED]

Mr. Davronbek Buriev ([REDACTED] 51) Uzbekistan

The ship is scheduled to leave Tortola at 6p.m. tonight. The passengers did not notify anyone on the ship about their plans to leave and not return.

Please do not hesitate to contact me if you require any further assistance.

Call during my office hours: Tuesday -Friday: 10 a.m. - 7 p.m. & Saturday 8 a.m. - 5 p.m. (US Central Time)

US and Canada: 1-800-338-4962 ext. 7994, If I am not available, leave a message and I will return your call

For toll-free numbers from other countries, click [here](#).

Best regards,

Mr. Nathaniel Turley
Master Cruise Counselor
Vacations To Go
nturley@vacationstogo.com

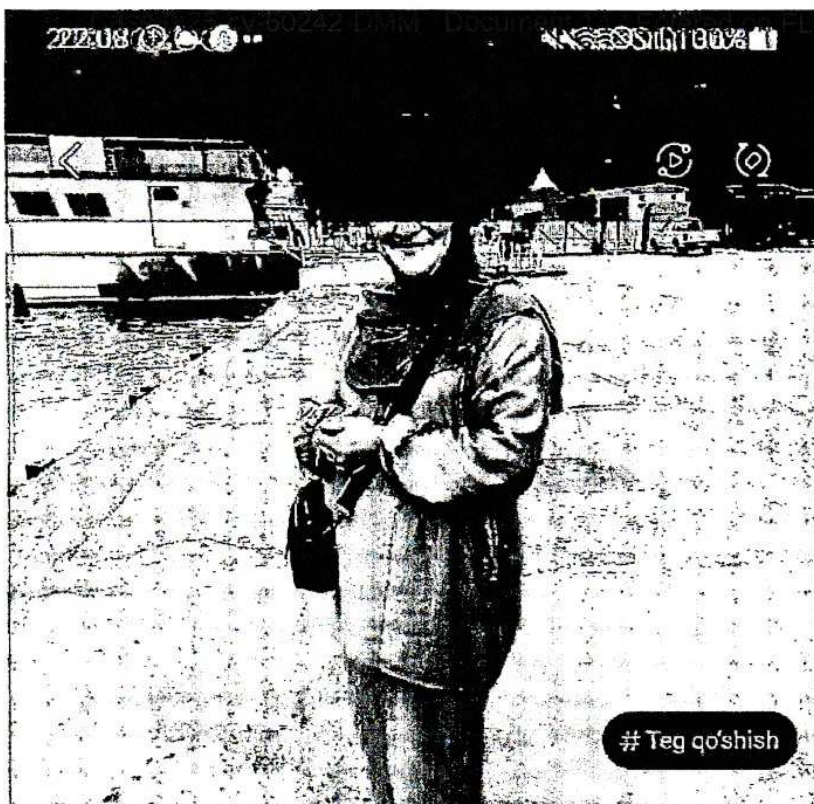
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Ko'proq vaqt birgalikda



UNITED STATES DISTRICT COURT
for the Southern District of Florida

HURIYAT MAMAJONOVA

Petitioner

v.

GARRETT RIPA, *et al.*

Respondents

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CASE NUMBER
0:25-cv-60242-DMM

REQUEST FOR PRODUCTION OF DOCUMENTS.

Pursuant to Federal Rules of Civil Procedure § 20(b), the Petitioner respectfully requests from Respondents to produce within 14 days of this request (1) her entire and complete Alien Record, including a report of her arrival on November 13, 2024 as well as (2) a footage from surveillance video cameras (closed circuit cameras) showing (a) her application for admission at U.S. Customs and Border Protection facility located in Cruz Bay, Saint Johns, U.S.V.I. on November 13, 2024 between 1600 and 1700 hours (b) her application for a preflight clearance at Cyril E. King Airport located in Charlotte-Amalie, Saint Thomas, U.S.V.I. on November 16, 2024 between 0700 and 0800 hours (c) her consequent application for a preflight clearance at U.S. Customs and Border Protection facility located in Blyden Ferry Terminal, Charlotte-Amalie, Saint Thomas, U.S.V.I. on November 16, 2024 between 0800 and 1000 hours.