

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
AT OWENSBORO

K.E.O.

PETITIONER

v.

CIVIL ACTION NO. 4:25-CV-00074-RGJ (*e-filed*)

Jason WOOSLEY, Grayson County Jailer; Samuel
OLSON, Field Office Director for U.S. Immigration
and Customs Enforcement; Kristi NOEM, in her
official capacity as Secretary, U.S. Department of
Homeland Security

RESPONDENTS

**UNOPPOSED MOTION AND AGREED ORDER TO AMEND AND CORRECT
SHOW CAUSE WHY THE WRIT OF HABEAS CORPUS SHOULD NOT BE GRANTED**

Respondents complied with the Court's order (Doc. 6) to show cause on or before August 1 why the writ of habeas corpus should not be granted. (Doc. 8.). Respondent's filing had two brief errors. The third page of the motion contains a block quote of 8 U.S.C. § 1252(g), and then a block quote of 8 U.S.C. § 1252(b)(9) that included the same text from § 1252(g); that additional text from § 1252(g) should have been omitted. (Doc. 8, PageID.76.). The first full paragraph on page 8 said "Petitioner's detention was always intended to last only a brief period of time so that a newborn could be nursed by its mother in the first months of its life", when that sentence should have read "Petitioner's *time out of* detention was always intended to last only a brief period of time so that a newborn could be nursed by its mother in the first months of its life". (Doc. 8, PageID.81.). Undersigned counsel informed Petitioner's counsel of those errors, and Petitioner's counsel graciously agreed to an order allowing submission of a revised filing with those changes.

For the foregoing reasons, Respondents move the Court to allow the attached, corrected filing titled Show Cause Why the Writ of Habeas Corpus Should Not Be Granted to supplant and replace the previously filed document with that title (Doc. 8).

KYLE G. BUMGARNER
United States Attorney

/s/ Jason Snyder
Jason Snyder
Assistant United States Attorney
717 W. Broadway
Louisville, KY 40202
(502) 582-6993
jason.snyder@usdoj.gov
Counsel for the United States

CERTIFICATE OF SERVICE

I hereby certify that on August 5, 2025, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to the following:

/s/ Jason Snyder
Jason Snyder
Assistant United States Attorney