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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

DIEN XUAN NGO,

PETITIONER,

v.

U.S. Dept. of Homeland Security, KRISTI
NOEM, in her capacity as Secretary of
Department of Homeland Security; TODD
LYONS in his capacity as the Acting
Director of ICE, JOSH JOHNSON in his
capacity as U.S. Immigration and Customs
Enforcement, Dallas Field Office Director,

RESPONDENTS.

Civil Case No.

3-25CV1943-D

PETITION FOR A WRIT OF HABEAS
CORPUS PURSUANT TO 28 U.S.C. § 2241,
BY A PERSON SUBJECT TO INDEFINITE
IMMIGRATION DETENTION

APPENDIX—EXHIBITS IN SUPPORT OF HABEAS PETITION

Ex. #	Description
1	2008 Agreement Between the United States of America and Vietnam: Repatriation (Signed at Hanoi January 22, 2008)
2	Asian Americans Advancing Justice Advisory for Advocates: Memorandum of Understanding Regarding Deportation of Pre-1995 Vietnamese (July 2021) ¹
3	H.R. 8922 – To halt removal of certain nationals of Vietnam, Cambodia, and Laos, and for other purposes, (Sept. 20, 2022) ²
4	Asian Law Caucus: Resources on Deportation of Vietnamese Immigrants Who Entered the U.S. Before 1995, Guides & Reports (June 12, 2025) https://www.asianlawcaucus.org/news-resources/guides-reports/trinh-reports

¹ This Exhibit includes the redacted version of the 2020 MOU provided by the government in response to a FOIA lawsuit seeking the agreement.

² This Bill never became a law.

Ex. #	Description
5	<u>Reports on Recent Deaths in ICE Custody:</u> • “Investigation underway after Vietnamese national in ICE custody died in the hospital” Laura Stickler and Patrick Smith, NBC News https://www.nbcnews.com/news/us-news/investigation-underway-vietnamese-national-ice-custody-died-hospital-rcna220180 (July 22, 2025) • ICE Newsroom, Miami, FL, Detainee Death Notifications, Canadian national in ICE custody passes away, https://www.ice.gov/news/releases/canadian-national-ice-custody-passes-away (June 25, 2025)
6	<u>Reports on ICE Detaining Noncitizens at Field Offices which are NOT Overnight Detention Facilities & Dire Conditions of Increasingly Overcrowded ICE Detention:</u> • “Inside the Burlington office ICE has used to detain immigrants,” Miriam Wasser, New Hampshire Public Radio, https://www.nhpr.org/2025-07-21/inside-the-burlington-office-ice-has-used-to-detain-immigrants (July 21, 2025) • <i>Concerns Grow Over Dire Conditions in Immigrant Detention</i>, N.Y. Times, Miriam Jordan and Jazmine Ulloa, (June 28, 2025) https://www.nytimes.com/2025/06/28/us/immigrant-detention-conditions.html
7	ICE Detainee Locator System – Showing “Contact Your Local Field Office”
8	Printout from DOJ EOIR Automated Case Information System Showing Final Order of Removal Issued on March 20, 2023.

Respectfully submitted,

/s/ Dan Gividen

DAN GIVIDEN

Attorney for Defendant

Gividen Law, PLLC

Texas Bar No. 24075434

18208 Preston Rd. D9-284

Dallas, Texas 75252

Telephone: 972-256-8642

Email: Dan@GividenLaw.com