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

VATSANA NOUANSISOUHAK,

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; THOMAS BERGAMI, in his capacity as Warden of the Prairieland Detention Center,

RESPONDENTS.

Civil Case No.

3:25CV2222-K

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	Asian Law Caucus: Resources for Southeast Asian Refugees Facing Deportation, Guides & Reports (July 29, 2025) https://www.asianlawcaucus.org/news-resources/guides-reports/resources-southeast-asian-refugees-facing-deportation#:~:text=Laos :
2	Decree of the President of the Lao People's Democratic Republic - On the Promulgation of the Law on Lao Nationality, President's Office, No. 35/PO (May 17, 2004).
3	H.R. 8922 – To halt removal of certain nationals of Vietnam, Cambodia, and Laos, and for other purposes, (Sept. 20, 2022) ¹
4	"Trump's Deportation Push Alarms a Louisiana Refugee Community," Alena Maschke, The Current, Louisiana Illuminator, (May 24, 2025). https://lailluminator.com/2025/05/24/louisiana-laos/

¹ 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> • “<i>Inside the Burlington office ICE has used to detain immigrants.</i>” 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 in ICE Custody at the Prairieland Detention Center
8	Printout from DOJ EOIR Automated Case Information System Showing Final Order of Removal on January 29, 1998.

Respectfully submitted,
/s/ Dan Gividen
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