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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JEFFERSON DOMINGUEZ-LARA; and
JOSE RAMIREZ,

Petitioners,

v.

DEPARTMENT OF HOMELAND
SECURITY (DHS); KRISTI NOEM,
Secretary, DHS; PAM BONDI, United
States Attorney General; TODD LYONS,
Director of United States Immigration and
Customs Enforcement (ICE); BRYAN
WILCOX, Field Office Director for
Detention and Removal, ICE; JOHN
MATTOS, Warden, Nevada Southern
Detention Center; EXECUTIVE OFFICE
FOR IMMIGRATION REVIEW (EOIR);
SIRCE OWEN, Acting Director, EOIR;
LAS VEGAS IMMIGRATION COURT,

Respondents.

Case No. 2:25-cv-01553-JAD-BNW

**Federal Respondents' Second Status
Report Pursuant to the Court's Order
(ECF No. 27)**

The Federal Respondents hereby file their second status report in their efforts to comply with the minute order that the Court issued as ECF No. 27 on October 20, 2025 ("Court's Order"). The Court's Order instructed the Federal Respondents to, *inter alia*, file a status report by October 22, 2025, "setting forth the number of individuals currently detained in ICE custody in the District of Nevada and the anticipated amount of time needed to obtain [certain information regarding the detainees]." ECF No. 27.

1 In their prior status report (ECF No. 29), the Federal Respondents described their
 2 efforts to comply with the Court's Order and noted for the court that ICE currently has 595
 3 individual detainees in its custody, with the following breakdown per facility:

- 4 • **Nevada Southern Detention Center** – 455 detainees
- 5 • **Henderson Detention Center** – 98 detainees
- 6 • **Washoe County** – 42 detainees

7 Having provided the total number of detainees, the Federal Respondents and
 8 undesignated counsel have continued to work diligently to determine the amount of time
 9 required to obtain the detailed information for the pertinent detainees, as specified in the
 10 Court's Order. Upon information and belief, *approximately* 185 of the 595 detained
 11 individuals are believed to be "applicants for admission" subject to the mandatory detention
 12 provisions of 8 U.S.C. § 1225(b)(2). The Federal Respondents emphasize that this figure is a
 13 preliminary estimate that is subject to revision as DHS continues its review.

14 Further, upon information and belief, the standard process¹ that DHS employs to
 15 prepare for review an individual's immigration court records is time consuming. It generally
 16 would take DHS about one hour per individual to prepare their court records for review.
 17 According to this estimate, DHS would then need roughly 185 hours to prepare the
 18 materials necessary to comply with the Court's Order. The preparation process must occur
 19 before any substantive review can begin, and it includes accessing, retrieving, compiling,
 20 and organizing an individual's immigration documents. The Federal Respondents anticipate
 21 that the pertinent documents would include materials such as briefs, court orders, notices to
 22 appear, forms filed with the immigration court, and the like. Each document must be
 23 accessed and retrieved separately.

24 DHS is currently compiling a list consisting of a subset of the information requested
 25 in the Court's Order — specifically, the names, A Numbers, and dates of detention of those

26 ¹ In addition to the traditional process, the Federal Respondents are currently inquiring
 27 regarding the availability of technical tools that DHS could rely upon to expedite the
 28 preparation process. The Federal Respondents have not yet resolved this question and will
 need additional time to determine whether such a tool is available.

1 individuals that are currently detained as “applicants for admission” subject to the
2 mandatory detention provisions of § 1225(b)(2). Based on the scope of the task and the
3 resources available, the Federal Respondents reasonably anticipate providing this list to the
4 Court and opposing counsel² within one week, or by **October 31, 2025**. By the same date,
5 the Federal Respondents reasonably anticipate that they will be able to provide the Court
6 with a more refined estimate of the additional of time needed to compile the remaining
7 information for the individuals detained under § 1225(b)(2).

8 The Federal Respondents will continue working diligently to fulfill the Court’s
9 directives and will file an updated status report on or before Friday, October 31, 2025,
10 detailing their further progress. In light of this timeline, the Federal Respondents
11 respectfully request that the deadline for submission of the parties’ proposed briefing
12 schedule — currently set for October 29, 2025 — be extended to November 5, 2025. This
13 short extension will allow the parties to confer following the Federal Respondents’
14 forthcoming disclosure of the anticipated production schedule and will avoid the need for
15 subsequent amendments or extensions, thereby promoting judicial efficiency and conserving
16 resources.

17 Respectfully submitted this 24th day of October 2025.

18 SIGAL CHATTAH
19 Acting United States Attorney

20 /s/ Christian R. Ruiz
21 CHRISTIAN R. RUIZ
22 Assistant United States Attorney
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27 ² As the Court observed, any such disclosures will be subject to a protective order among the
28 parties, a draft of which the Federal Respondents will circulate no later than October 28,
2025, for review and comment.