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8 Counsel for Petitioners

9 **UNITED STATES DISTRICT COURT FOR THE**
10 **SOUTHERN DISTRICT OF CALIFORNIA**

11 Thoth SUN;

12 Petitioners,

13 v.
14

15 Kristi NOEM, et al.

16 Respondents.
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No. 3:25-cv-02433-CAB-MMP

DECLARATION OF STACY
TOLCHIN IN RESPONSE TO
COURT ORDER

1 I, Stacy Tolchin, hereby declare and state the following:

2 1. My business address is Law Offices of Stacy Tolchin, 776 E. Green St.
3 Suite 210, Pasadena, CA 91101.

4 2. I have personal knowledge of the events described below and represent
5 Petitioners before the immigration court.

6 3. This declaration supplements the declaration filed by Petitioner on
7 September 29, 2025. The Court also asked about the date that Petitioner's order of
8 removal became final. The order was entered on May 3, 2004. It is unclear from the
9 removal order (previously attached as Exhibit C) if Petitioner reserved appeal. He
10 did not appeal, but if he did reserve appeal then the order became final June 3,
11 2004. If he did not, then it was final on May 3, 2004.

12 4. It appears from the record that Petitioner has not been detained 180 days
13 after a final order of removal.

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16 Pursuant to 28 C.F.R. § 24.201(f), I hereby verify that the information
17 provided in the application and all accompanying material is true and correct to the
18 best of my information and belief. Executed this 29th day of September 2025 at
19 Pasadena, CA.

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21 S/Stacy Tolchin

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