

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

ELEAZAR MORALES-MARTINEZ,

Petitioner,

v.

KEVIN RAYCRAFT, Acting Field
Office Director of Enforcement and
Removal Operations, Detroit Field
Office, Immigration and Customs
Enforcement; KRISTI NOEM,
Secretary, U.S. Department of Homeland
Security; U.S. DEPARTMENT OF
HOMELAND SECURITY; PAMELA
BONDI, U.S. Attorney General;
EXECUTIVE OFFICE FOR
IMMIGRATION REVIEW,

Respondents.

Case No. 4:25-cv-13303

Hon. F. Kay Behm

Mag. Judge Elizabeth A. Stafford

PETITIONER'S NOTICE OF SUPPLEMENTAL AUTHORITY

Petitioner submits this notice of supplemental authority to bring to the Court's attention a new decision granting relief to a habeas petitioner in a case involving the same legal issues present in this case: *Gimenez Gonzalez v. Raycraft, et al.*, No. 25-cv-13094 (E.D. Mich. October 27, 2025) (attached as Exhibit A). There are now ten decisions from five District Judges in the Eastern District of Michigan granting

similarly situated habeas petitioners the same relief as requested by Mr. Morales-Martinez and rejecting the government's arguments in doing so.

Dated: October 29, 2025

/s/ Russell Reid Abrutyn
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Certificate of Service

I hereby certify that on October 29, 2025, I electronically filed the foregoing paper with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the parties of record.

/s/ Russell Reid Abrutyn

Russell Abrutyn

Attorney for Petitioner