

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

GIAO PHONG LE NGUYEN,

Petitioner,

v.

Case No. 2:25-cv-01198

KRISTI NOEM, in her official capacity as Secretary of the Department of Homeland Security; PAMELA BONDI, in her official capacity as Attorney General of the United States; TODD M. LYONS, in his official capacity as Acting Director and Senior Official Performing the Duties of the Director of U.S. Immigration and Customs Enforcement; MARY DE ANDA-YBARRA, in her official capacity as Field Office of U.S. Immigration and Customs Enforcement, Enforcement and Removal Operations; and DORA CASTRO, in her official capacity as Warden of the Otero County Processing Center,

Respondents.

**NOTICE OF COMPLIANCE WITH ORDER [Doc. 4] AND
JOINDER IN USA RESPONDENTS' FORTHCOMING CLAIMS AND DEFENSES**

Respondent Dora Castro, by and through her attorneys of record, Sutin, Thayer & Browne, a Professional Corporation (Christina Muscarella Gooch), and pursuant to the Court's Second Order to Show Cause [Doc. 4] entered on December 12, 2025, hereby notifies the Court that she takes no positions separate from the USA Respondents related to the Petition [Doc. 1], and that she hereby joins in the position(s) that the USA Respondents may take related to the Petition and/or other pleadings filed in this matter.

Respectfully submitted,

SUTIN, THAYER & BROWNE
A Professional Corporation

By /s/ Christina Muscarella Gooch
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Attorney for Respondent Dora Castro

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 14, 2026, I filed the foregoing pleading electronically through the CM/ECF system, which caused all parties and counsel of record to be served, as more fully reflected on the Notice of Electronic Filing.

SUTIN, THAYER & BROWNE
A Professional Corporation

By /s/ Christina Muscarella Gooch

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