

Ashlee B. Hesman
Nevada Bar No. 012740
STRUCK LOVE ACEDO, PLC
3100 West Ray Road, Suite 300
Chandler, Arizona 85226
Tel.: (480) 420-1600
Fax: (480) 420-1695
ahesman@strucklove.com

James E. Harper
Nevada Bar No. 9822
HARPER | WIXOM
1935 Village Center Circle
Las Vegas, Nevada 89134
Tel: (702) 252-5002
Fax: (702) 252-5006
eservice@harperwixom.com

Attorneys for Respondent John Mattos

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Junior Alexander Ramirez-Ramos,

Petitioner,

v.

Kristi Noem, et al.,

Respondents.

Case No. 2:26-cv-00332-RFB-MDC

**RESPONDENT MATTOS' RESPONSE
TO MOTION FOR PRELIMINARY
INJUNCTION AND PETITION FOR
WRIT OF HABEAS CORPUS**

Respondent John Mattos responds to the Motion for Preliminary Injunction (ECF No. 2) and Petition for Writ of Habeas Corpus (ECF No. 1). He takes no position on the relief requested by Petitioner. As Warden of the Nevada Southern Detention Center ("NSDC"), a private facility owned and operated by CoreCivic, Inc. pursuant to a detention services agreement with U.S. Immigration and Customs Enforcement ("ICE"), Warden Mattos had (and has) no involvement in Petitioner's immigration proceedings and no independent authority to release Petitioner. Warden Mattos and CoreCivic take no position on the habeas or bond relief sought.

1 RESPECTFULLY SUBMITTED this 17th day of February 2026.

2 STRUCK LOVE ACEDO, PLC

3 By /s/ Ashlee B. Hesman

4 Ashlee B. Hesman
5 3100 West Ray Road, Suite 300
6 Chandler, AZ 85226
7 ahesman@strucklove.com

8 James E. Harper
9 HARPER | WIXOM
10 1935 Village Center Circle
11 Las Vegas, Nevada 89134
12 eservice@harperwixom.com

13 *Attorneys for Respondent John Mattos*
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on February 17, 2026, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Edgar Flores
Edgar Flores Law
4811 W. Desert Inn Rd., Ste. B
Las Vegas, NV 89102
EdgarFloreslaw@gmail.com

Attorneys for Petitioner

Virginia Tomova
DOJ-USAO
501 Las Vegas Blvd. South
Suite 1100
Las Vegas, NV 89101
Virginia.tomova@usdoj.gov

Attorney for Respondents Bondi, Department of Justice, Hogan, Lyons, Noem, Owen

Sigal Chattah , Govt
US Attorney's Office
District of Nevada
501 Las Vegas Blvd South
Suite 1100
Las Vegas, NV 89101
Sigal.Chattah@usdoj.gov

Summer Allegra Johnson
DOJ-USAO
501 Las Vegas Blvd. South
Suite 1100
Las Vegas, NV 89101
summer.johnson@usdoj.gov

Attorney for Interested Party United States Attorney for the District of Nevada

/s/ E. Percevecz