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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 Bui Tu Tan,

11 Petitioner,

12 v.

13 Pamela Bondi, *et al.*,

14 Respondents.
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Case No. 2:26-cv-00412-CDS-NJK

Motion for Status Check

1 Petitioner Bui Tu Tan, through counsel, requests this Court schedule a status
2 check for Respondents to provide the Court and defense counsel with information
3 regarding his current whereabouts.

4 On February 17, 2026, Mr. Tan filed a pro se Petition for Writ of Habeas
5 Corpus and concurrent Application to Proceed in District Court without Prepaying
6 Fees or Costs (shortform), and a Motion for the Appointment of Counsel. ECF Nos.
7 1, 1-1, 2. On February 19, 2026, this Court appointed the Federal Public Defender
8 to represent him, set filing deadlines, and specifically ordered that Respondents not
9 transfer Mr. Tan out of the district except to effectuate a lawful deportation. ECF
10 No. 4. Mr. Tan's Amended Petition is due on March 13, 2026.

11 On Monday, March 2, 2026, counsel contacted Nevada Southern Detention
12 Center (NSDC) Officer Rodriguez to schedule a video visit with Mr. Tan. Officer
13 Rodriguez advised that Mr. Tan was no longer at the facility and had been released
14 on March 1, 2026. A search of the online detainee locator system showed "zero
15 results." Counsel searched both by A-Number and by biographical information, with
16 a date-of-birth provided by NSDC, and even various possible misspellings of Mr.
17 Tan's name. Additionally, the Henderson jail, which sometimes houses immigration
18 detainees, was searched with negative results. Counsel continued to check the
19 online detainee locator system at periodic intervals that day and the following day,
20 with no change in results.

21 Supervising counsel has also assisted undersigned counsel's efforts to
22 continue searching for Mr. Tan's location. On the evening of March 3, 2026,
23 supervising attorney Sylvia Irwin checked the online detainee locator system. At

1 that time, the results showed that Mr. Tan had been moved to the facility in
2 Florence, Arizona. However, the following morning, on March 4, 2026, when
3 undersigned counsel searched the online detainee locator system, the search
4 returned “zero results” for Mr. Tan.

5 Most recently, just prior to filing this motion, undersigned counsel again
6 checked the detainee locator system—again, by both biographical information and
7 by A-number. Again, all searches returned “zero results.”

8 Counsel also telephoned government counsel, AUSA Virginia Tomova for
9 assistance in helping to locate Mr. Tan. On March 2, 2026, counsel left Ms. Tomova
10 a voicemail and reached out by email requesting assistance locating Mr. Tan.
11 Counsel did not receive a reply from Ms. Tomova by telephone or by email on March
12 3, 2026. On March 4, 2026, counsel again emailed Ms. Tomova.

13 As of the time of this filing, counsel has not received any reply from Ms.
14 Tomova or any other government counsel.

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1 Counsel is presently unaware of Mr. Tan's location. It appears he was either
2 moved out of this district, in violation of this Court's order, or was deported.
3 Accordingly, counsel asks this Court to schedule a status check or enter an order
4 requiring Respondents to provide the Court and defense counsel with information
5 regarding Mr. Tan's current whereabouts or confirm whether he was deported.

6 Dated this 4th day of March, 2026.

7 Respectfully submitted,

8 Rene L. Valladares
9 Federal Public Defender

10 /s/ Lisa C. Brunner
11 Lisa C. Brunner
12 Assistant Federal Public Defender
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