UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

BHARATBHAI PATEL, Petitioner, v. KRISTI NOEM, et al., Respondents.	Case No. 1:26-cv-211

STATEMENT REGARDING CLAIMS

Pursuant to the Court's Order denying his Motion for Temporary Restraining Order (Dkt. No. 15) (the "Order"), Petitioner Bharatbhai Patel provides the Court with the following statement regarding pending and unresolved claims in this matter:

Mr. Patel has moved for reconsideration of the Court's Order contending that his due process claims—under *Zadvydas* and otherwise—should be resolved in his favor because, in his view, the government should bear the burden in his challenge to his revocation of his order of supervision and his deferred action. Even if the Court is unpersuaded by Mr. Patel's arguments, he believes that his due process claims should remain pending and that he should be permitted leave to issue written discovery concerning the government's purported revocation of his order of supervision. A motion for limited discovery is filed concurrently with this statement.

Mr. Patel also believes that the government's actions have violated the Immigration and Nationality Act and Administrative Procedure Act. He would therefore also seek leave to amend his petition to state those claims.

Dated: March 27, 2026

Respectfully submitted,

/s/ James M. Slater
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of this document will be served on all counsel of record via CM/ECF.

/s/ James M. Slater
James M. Slater