UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

K.Y.M.C., C.Y.M.C., and [redacted] as Next Friend,	§	
Petitioners	§	
v.	§	CIVIL ACTION NO. 4:26-CV-1656
ROBERT F. KENNEDY, JR., *et al.*,	§	
Respondents	§	

PETITIONERS' RESPONSE
TO RESPONDENTS' RESPONSE TO ORDER TO SHOW CAUSE

TO THE HONORABLE JUDGE OF THE COURT:

Petitioners, through undersigned counsel, respectfully submit this response to the Federal Respondents' Response to Order to Show Cause dated May 10, 2026, and state as follows:

As the Federal Respondents indicated in their Response, K.Y.M.C. and C.Y.M.C. were discharged from the custody of the Department of Health and Human Services' Office of Refugee Resettlement (ORR) this past Saturday, May 9, 2026 and reunified with their father and Next Friend, [redacted], in North Carolina, as requested in the Petition for Writ of Habeas Corpus.

Upon information and belief, this reunification occurred *because of* the filing of the Petition for Writ of Habeas Corpus, and the Judge's issuance of an Order to Show Cause, as undersigned counsel's pre-litigation attempts to negotiate with ORR officials were wholly unsuccessful.

The minor Petitioners in this case spent 364 days in ORR custody despite the fact that their father's biological relationship was proven through DNA testing on or before June of 2025, and he complied with numerous requirements to prove his fitness to receive and care for his children over the past year without ever receiving a decision on his sponsorship application—until last week.

Nonetheless, Petitioners are grateful to be reunified, and in light of this reunification, Petitioners do not oppose dismissal of the current petition without prejudice.

However, Petitioners expressly reserve and preserve all rights to:

a. Refile a habeas petition in the future should circumstances change or new grounds arise;

b. Pursue any other remedies available under federal or state law; and

c. Raise any claims not adjudicated on the merits in this proceeding.

Petitioners' agreement to dismissal is made solely for purposes of judicial efficiency and should not be construed as a waiver of any substantive or procedural rights.

Dated: April 12, 2026

Respectfully submitted,

/s/ Alexa Sendukas
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Pro Bono Attorneys for Petitioners

CERTIFICATE OF SERVICE

I hereby certify that on April 12, 2026, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Alexa L. Sendukas
Alexa L. Sendukas
Attorney for Petitioners