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7 UNITED STATES DISTRICT COURT
8 SOUTHERN DISTRICT OF CALIFORNIA

9 NAHOM HAFTOM BERHE,

10 Petitioner,

11 v.

12 MARKWAYNE MULLIN, Secretary of the
Department of Homeland Security, *et al.*,

13 Respondents.
14

Case No. 26-cv-02828-JES-VET

**RESPONDENTS'
SUPPLEMENTAL BRIEF IN
SUPPORT OF MOTION TO
VACATE ORDER TO SHOW
CAUSE**

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16 Pursuant to the Court's May 26, 2026 Order Setting Briefing Schedule, ECF No.
17 9, Respondents submit the attached Supplemental Declaration of Vu Cam ("Cam
18 Decl."), received from ICE counsel, addressing the information requested by this Court.
19 See Cam Decl. ¶¶ 4-6. Respondents additionally submit, for the Court's review, the
20 Department of Homeland Security's memorandum entitled "Guidance Regarding Third
21 Country Removals" dated March 30, 2025, referenced in the supplemental declaration.
22 See Exhibit 1.

23 Dated: May 28, 2026

Respectfully submitted,

24 ADAM GORDON
25 United States Attorney

26 s/ Camille Savedra
27 CAMILLE SAVEDRA
28 Assistant United States Attorney
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