

STEPHEN W. MANNING, OSB # 013373
stephen@innovationlawlab.org
smanning@ilgrp.com
TESS HELLGREN, OSB # 191622
tess@innovationlawlab.org
JORDAN CUNNINGS, OSB # 182928
jordan@innovationlawlab.org
NELLY GARCIA ORJUELA, OSB #223308
nelly@innovationlawlab.org
INNOVATION LAW LAB
333 SW 5th Ave., Suite 200
Portland, OR 97204-1748
Telephone: +1 503-922-3042

Attorneys for Petitioner

SCOTT E. BRADFORD, OSB #062824
United States Attorney
District of Oregon
ARIANA N. GAROUSI, CSB #347758
Assistant United States Attorneys
1000 SW Third Ave., Suite 600
Portland, Oregon 97204-2936
Telephone: (503) 727-1000
Email: Ariana.Garousi@usdoj.gov

Attorneys for Respondents

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Eugene Division

M-J-M-A-, an adult

Petitioner,

v.

LAURA HERMOSILLO, Seattle Field Office
Director, Immigration and Customs
Enforcement and Removal Operations
("ICE/ERO"); TODD LYONS, Acting
Director of Immigration Customs
Enforcement ("ICE"); U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT; KRISTI
NOEM, Secretary of the Department of
Homeland Security ("DHS"); U.S.
DEPARTMENT OF HOMELAND
SECURITY; and PAMELA BONDI, Attorney
General of the United States,

Respondents.

Case No. 6:25-cv-02011-MTK

Agency No. XXX-XXX-902

JOINT WITNESS LIST

Petitioner's Witness List

Petitioner hereby provides the witnesses whom Petitioner may call during the evidentiary hearing scheduled for December 2, 2025:

1. M-J-M-A-, Petitioner
2. Kelsey Provo, Attorney

Petitioner anticipates the Petitioner's direct examination lasting one hour and Ms. Provo's direct examination lasting 30 minutes.

Respondents' Witness List

Respondents hereby provide the witnesses whom the government may call during the evidentiary hearing scheduled for December 2, 2025:

1. J.B., ICE Deportation Officer
2. J.A., ICE Deportation Officer
3. C.H., ICE Supervisor Detention & Deportation Officer
4. M.K., CBP Officer
5. A.W., Border Patrol Agent
6. D.R., ICE Deportation Officer
7. C.M., Border Patrol Agent
8. R.F., ICE Supervisory Detention & Deportation Officer
9. A.A., ICE Deportation Officer

Respondents anticipate each witnesses' direct examination lasting an average of 30 minutes. Respondents also request that officers' initials be used in place of the officers' full names during the evidentiary hearing to protect the identities of law enforcement personnel. This request aligns with the reasoning for the protective order entered in this case. Petitioner does not oppose this request and agrees to refer to the witnesses by their initials for the purposes of the hearing.

Additional Witnesses

Petitioner asserts the following individuals are witnesses who must be present to testify as witnesses who were responsible for the arrest of the petitioner, the deprivation of right to counsel or have knowledge of the basis for Petitioner's detention. Respondents do not agree that all of these individuals have relevant knowledge. Respondents will file a motion this weekend addressing this dispute.

1. Mathew Cantrell, ICE Assistant Field Office Director
2. K.K., ICE Supervisory Detention & Deportation Officer
3. B.W., DHS agent
4. C.S.W., DHS agent
5. S.P.S., DHS agent
6. D.B., DHS agent
7. J.L., DHS agent
8. Security Guard at ICE Portland Office (referenced in ECF 16)

Respectfully submitted this 28th day of November, 2025,

s/ Stephen W. Manning
 STEPHEN W. MANNING, OSB # 013373
 stephen@innovationlawlab.org
 TESS HELLGREN, OSB # 191622
 tess@innovationlawlab.org
 JORDAN CUNNINGS, OSB # 182928
 jordan@innovationlawlab.org
 NELLY GARCIA ORJUELA, OSB #223308
 nelly@innovationlawlab.org
 INNOVATION LAW LAB
 333 SW 5th Ave., Suite 200
 Portland, OR 97204-1748
 Telephone: +1 503-922-3042

s/ Ariana N. Garousi
 ARIANA N. GAROUSI, CSB #347758
 Assistant United States Attorneys
 1000 SW Third Ave., Suite 600
 Portland, Oregon 97204-2936
 Telephone: (503) 727-1000
 Email: Ariana.Garousi@usdoj.gov
 SCOTT E. BRADFORD, OSB #062824
 United States Attorney
 District of Oregon