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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

M-J-M-A-,

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

Petitioner,

v.

**LAURA HERMOSILLO; TODD
LYONS; U.S. IMMIGRATION AND
CUSTOMS ENFORCEMENT;
KRISTI NOEM; U.S. DEPARTMENT
OF HOMELAND SECURITY;
PAMELA BONDI,**

**RESPONDENTS' SECOND NOTICE
OF COMPLIANCE WITH THE
COURT'S ORDER REGARDING
PRODUCING WITNESSES AT THE
EVIDENTIARY HEARING**

Respondents.

The government advises that it declines to produce a government employee identified by counsel for Petitioner because that person does not properly fall within the contours of the Court's orders.

The day after Thanksgiving, counsel for Petitioner informed government counsel of Petitioner's desire to compel the attendance of certain government employees at the December 2, 2025, evidentiary hearing. The government agreed to arrange the attendance of some of those people, but declined to arrange the attendance of others. *See* ECF 44.

After further investigation, the government declines to arrange for the appearance of:

K.K., an ICE Supervisory Detention & Deportation Officer – Based in Omaha, Nebraska. Is a supervisor who was not involved in Petitioner's arrest, but was at the Portland ICE office after the arrest and during Petitioner's processing. He was a processing supervisor who completed I-200s (warrants) for any case that did not already have an I-200 available for the file. His team received the encounter narrative from the field team and completed the I-213 (arrest report, written by a witness who will appear at the hearing) during processing. Witnesses at the hearing will explain that there was no I-200 (warrant) for Petitioner. K.K.'s involvement in this case was limited to the ministerial task of preparing a warrant after Petitioner had been taken into custody.

The government advises the Court that this individual does not properly fall within the scope of the Court's October 31 and November 4, 2025, Orders because he were not "involved in" Petitioner's arrest; does not have any "knowledge of the basis for" her detention, apart from what he may have read in materials written by

witnesses who *will* appear at the evidentiary hearing; and was not “involved in” any alleged deprivation of counsel.

Importantly, if counsel for Petitioner were seeking to compel the appearance of this person under the Federal Rules of Civil Procedure, that attempt would likely fail the proportionality test in Rule 26(b)(1) because the burden and expense of bringing that person to Portland outweighs the benefit of the limited information that he might provide.

The government respectfully declines the request of Petitioner’s counsel to arrange for this person to appear at the evidentiary hearing.

Respectfully submitted this 30th day of November 2025.

SCOTT E. BRADFORD
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