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Attorneys for Petitioner

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Eugene Division

M-J-M-A-, an adult

Petitioner,

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

Agency No. XXX-XXX-902

v.

CAMMILLA WAMSLEY, 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.

**PETITIONER'S FIRST SET OF
REQUESTS FOR PRODUCTION TO ALL
RESPONDENTS**

Pursuant to 28 U.S.C. § 2246, Federal Rules of Civil Procedure 26 and 34, and the Local Rules of the United States District Court for the District of Oregon (the “Local Rules”), and following the Court Order from October 31, 2025, Dkt. 14, Petitioner M-J-M-A- (“Petitioner”) requests that Respondents produce each of the Documents described below on or before November 14, 2025 (“Requests”).

DEFINITIONS

The following definitions shall apply to each of the requests for production of documents set forth below.

A. “You” and “your” shall mean and refer to each respondent to whom these requests are directed and, where appropriate in the context, his or her agents, representatives, employees, attorneys and investigators.

B. “A-file” shall mean and refer to a noncitizen’s official file for all immigration records, consisting of all individual files pertaining to a noncitizen’s Alien Registration Number (“A-Number”), the unique personal identifier assigned by Respondents to each noncitizen.

C. “DHS” shall mean and refer to the U.S. Department of Homeland Security and, where appropriate in the context, its headquarters and offices, including any divisions, subdivisions, components or sections therein, or any other organizational structures, including but not limited to subagencies such as U.S. Immigration and Customs Enforcement (“ICE”), ICE Field Offices and private contractors, agents, locations, and structures hired by or reporting to ICE.

D. “Person(s)” shall mean and refer to any individual, including, without limitation, any government official (elected or appointed) or entity, including, without limitation, any government agency, division, subdivision or section therein, sole proprietorship, association, company, partnership, joint venture, corporation, trust, estate or any other entity.

E. “Communication(s)” shall mean and refer to information that is exchanged by or through any mode or medium including, but not limited to, spoken word, written

correspondence, any form of technology, face-to-face meetings or conveying of information through third person(s) to some other intended recipient.

F. “Document(s)” is used in its customary broad sense, and includes, but is not limited to, any written, printed, typed, recorded, videotaped, filmed, punched, transcribed, taped, electronically-created or other graphic matter of any kind or nature held or produced or reproduced, whether sent or received, including the original, and includes, but is not limited to, all correspondence, emails, records, drawings, calculations, memoranda, reports, financial statements, telegrams, cables, contracts, tabulations, studies, analyses, evaluations, work appointment books, diaries, comparisons, questionnaires, surveys, charts, graphs, books, pamphlets, booklets, articles, magazines, newspapers, microfilm, microfiche, photographs, tapes or other recordings, punched cards, magnetic tapes, discs, printouts, computer generated reports and printouts, other data compilations from which information can be obtained, and includes all such document(s) that are in your possession, custody or control, or to which you otherwise have access. The term document(s) encompasses all communications available in the foregoing formats.

G. Any request for “all documents” is meant to include all documents in your possession, custody or control (including, without limitation, documents which may be in the physical possession of persons such as your affiliates, partners, agents, consultants, employees, advisors, attorneys, investigators and representatives), or to which you otherwise have access, whether the documents were compiled by you or by any other person for any reason whatsoever.

H. “Relating to” as used herein, shall mean constituting, comprising, pertaining to, in connection with, reflecting, respecting, regarding, referring to, based upon, stating, showing, evidencing, establishing, supporting, negating, contradicting, describing, recording, noting, embodying, memorializing, containing, mentioning, studying, analyzing, discussing, specifying, setting forth, identifying or in any manner logically, factually, indirectly or directly, or in any other way connecting to the matter addressed in the request, in whole or in part.

I. The term “including” means “including but not limited to.”

J. The terms “and” and “or” shall be construed conjunctively or disjunctively as necessary to make the request inclusive rather than exclusive, and each shall include the other wherever such dual construction will serve to bring within the scope of these requests any document which would otherwise not be brought within its scope. Furthermore, wherever the word “any” appears, it shall be read and applied so as to include the word “all,” and vice versa. Except as specifically provided herein, words imparting the singular shall include the plural and vice versa, where appropriate.

INSTRUCTIONS

1. Pursuant to Federal Rule of Civil Procedure 34(b), all documents shall be produced in the form in which they are maintained in the normal course of business or in the form in which they were found in their normal filing places, including file folders or other bindings in which such documents were found. Documents attached to each other should not be separated. If for any reason the container cannot be produced, produce copies of all labels or other identifying markings. Documents may also be produced by an electronic database provided that it is clear and unambiguous as to the source, date, and any other applicable metadata of each document.

2. With respect to any document responsive to these Requests that you contend you are not required to produce because of an alleged privilege (which you are not presently prepared to waive), describe each such alleged privileged document as follows:

- (a) Give the title and subject matter of the document;
- (b) Give the date of each such document;
- (c) Give the number of pages of each such document;
- (d) Identify each person who wrote, signed, initialed, dictated or otherwise participated in the creation of the document;
- (e) Identify each person to whom the original or copy of the document was sent;

- (f) Identify each person who currently has custody, or who has ever had custody, of the original or a copy of the document;
- (g) Identify each document that refers to, discusses, analyzes or comments upon it, in whole or in part, or which contains any or all of its contents;
- (h) Identify the type of document (e.g., letter, memorandum, note);
- (i) State any basis for claiming privilege, and provide sufficient information regarding the document to explain the claim of privilege and to permit the adjudication of the propriety of that claim; and
- (j) State the request to which such document is responsive.

3. With respect to any document responsive to these Requests that is no longer in your control, has been destroyed, lost or otherwise disposed of or not produced, please provide the following information:

- (a) The date of each such document;
- (b) The date the document was destroyed, lost or otherwise disposed of;
- (c) The type of document (e.g., letter, memorandum, note);
- (d) The number of pages of the document;
- (e) The title and subject matter of the document;
- (f) The reason for loss, destruction or disposal of the document;
- (g) Identify the custodian of the document at the time of loss, destruction or disposal;
- (h) Identify each person who has knowledge of the circumstances of such loss, destruction or disposal, and state the knowledge each such person has;
- (i) Identify each person who wrote, signed, initialed, dictated or otherwise participated in the creation of the document;

- (j) Identify each person to whom the original or a copy of the document was sent;
- (k) Identify each person who has knowledge of the contents of the document;
- (l) Identify each person who had custody of the original or a copy of the document;
- (m) Identify every document that refers to, discusses, analyzes or comments upon it, in whole or in part, or which contains any or all of its contents; and
- (n) Identify the request to which such document is responsive.

4. If you object to any term or phrase as vague, ambiguous, or indefinite, then provide your understanding of the term or phrase and respond accordingly.

5. You shall produce each Document in its entirety.

6. Documents provided in response hereto shall be produced as they are kept in the ordinary course.

7. You shall produce as a separate document any Document that contains any notation, addition, insertion, or marking of any kind that renders it not entirely identical to a version of that Document without such marks.

8. These discovery Requests are deemed continuing so as to require further and supplemental production if additional Documents are received, generated, or discovered after the time of the original production. If, after responding to these Requests, you obtain or become aware of any additional Documents that are directly or indirectly responsive to any part of any of these Requests, you shall promptly produce any additional responsive Documents.

9. The information and Documents requested include not only those personally known or available to you, but also those known or available to all of your attorneys, agents, employees, representatives, private investigators, and others who are in possession of or who may have obtained information for or on behalf of you.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

All documents relied on by Respondent or pertaining to Petitioner, that led to her stop and arrest on Thursday, October 30, 2025, including but not limited to any manifest, muster, or daily agenda issued by Respondent for the October 30, 2025 action by DHS.

REQUEST FOR PRODUCTION NO. 2:

All documents involved in the detention and processing of Petitioner in the course of her detention on and since October 30, 2025, including but not limited to:

- Any Form I-213 determination;
- Any I-200 Warrant for Arrest;
- Any documents Petitioner signed, was requested to sign, or were presented to her;
- Any transfer determination made;
- Any Notice to Appear issued;
- Any further booking records and/or processing documents.

REQUEST FOR PRODUCTION NO. 3:

Petitioner's complete A-file.

Dated: November 1, 2025.

s/ Stephen W. Manning

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