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March 11, 2026

Stephen W. Manning
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Re: *MJMA, et al. v. Hermosillo, et al.*
Case No. 6:25-cv-02011-MTK (D. Or.)

Dear Mr. Manning,

We appreciate your willingness to give us extra time to locate and produce the records for Requests 9.n. and 3.b–d. referenced in your discovery letter to the Court. We recognize that the extended deadline is today.

Today we learned that counsel for CBP have located information, primarily spreadsheets, related to this discovery item. We are waiting to receive those materials. Even if we were to receive them now, at 4:15 pm, we do not have a support person available today to redact or bates label them. We need to produce those tomorrow.

Because CBP counsel do not have access to the type of computer terminal that CBP agents used to run the database searches in the field, we do not yet have final search results to produce. We have asked CBP counsel in Seattle to enlist an agent to run such a search. We hope to have those results for you next week, although it is our understanding that CBP policies restricting the dissemination of those results may delay our ability to produce them.

I hope you know that we have been working diligently to get the information you requested. As always, we remain available to discuss concerns you may have about this or any other aspect of our litigation.

Stephen W. Manning
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Thank you for your time.

Sincerely,

SCOTT E. BRADFORD
United States Attorney

/s/ *Thomas Ratcliffe*
THOMAS RATCLIFFE
Assistant United States Attorney

cc: AUSA Garousi