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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION

Lazaro MALDONADO BAUTISTA, et al., on behalf of themselves and others similarly situated,

Plaintiffs-Petitioners,

v.

Kristi NOEM, Secretary, Department of Homeland Security; et al.

Defendants-Respondents.

Case No. 5:25-cv-01873-SSS-BFM

EX PARTE APPLICATION FOR RECONSIDERATION AND CLARIFICATION UNDER L.R. 7-18 AND L.R. 7-19 OF THE COURT'S ORDERS GRANTING PARTIAL SUMMARY JUDGMENT, CERTIFYING THE CLASS, AND GRANTING CLASS-WIDE DECLARATORY RELIEF; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT THEREOF

Judge: Sunshine S. Sykes

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EX PARTE APPLICATION FOR RECONSIDERATION AND CLARIFICATION

To all Parties and their attorneys of record: Please take notice that Plaintiffs-Petitioners Lazaro Maldonado Bautista, Ana Franco Galdamez, Ananias Pascual, and Luiz Alberto De Aquino De Aquino ("Named Plaintiffs"), on behalf of themselves and the certified class ("Plaintiffs"), hereby make this ex parte application for the Court to reconsider and clarify its recent Order granting partial summary judgment to the Named Plaintiffs, issued November 20, 2025 (Dkt. 81). Plaintiffs also ask this Court to reconsider and correct its inadvertent omission from its Order certifying the Bond Eligible Class, extending declaratory relief to the class, and appointing class counsel, issued November 25, 2025 (Dkt. 82). **Should the Court wish to discuss this application with the parties, Plaintiffs respectfully request that the Court order a status conference during the week of December 8, 2025 or the earliest date possible**.

As explained in the accompanying Memorandum of Points and Authorities, Plaintiffs make this application to address the government's ongoing refusal to comply with this Court's orders and provide class members with bond hearings. To eliminate any doubt regarding the government's legal obligations and ensure the government's compliance, Plaintiffs ask that the Court:

(1) Reconsider its November 20 Order granting partial summary judgment and clarify that its November 25 Order certifying the class and extending declaratory relief to the class was intended to render the November 20 Order a final judgment binding on the Defendants' and their agents;

(2) Direct entry of a final judgment under Fed. R. Civ. P. 54(b) as to Counts I and II of the complaint and Count III insofar as the challenged agency actions are "not in accordance with law," Dkt. 15 ¶¶ 99–112; and,

(3) Expressly confirm that the Court in its November 20 Order granting partial

summary judgment not only declared the challenged agency actions to be in violation of the statute, but also vacated the challenged agency actions under the Administrative Procedure Act, 5 U.S.C. § 706(2)—namely, Defendants' July 8, 2025 "Interim Guidance Regarding Detention Authority for Applicants for Admission" and the Board of Immigration Appeals' decision in *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025).

Finally, Plaintiffs also ask the Court to reconsider and clarify its November 25, 2025 Order certifying the Bond Eligible Class and appointing class counsel and:

(4) Appoint counsel from the ACLU Immigrants' Rights Project and ACLU of Southern California as additional class counsel under Fed. R. Civ. P. 23(g).

Plaintiffs make this application pursuant to L.R. 7-19 (ex parte applications) and L.R. 7-18(b)—that is, on grounds of "the emergence of new material facts" regarding the government's noncompliance "occurring after the Order[s] [were] entered." *Id*. Plaintiffs also make this application pursuant to Fed. R. Civ. P. 60(a) to the extent it corrects a mistake arising from oversight or omission, particularly as to the appointment of additional class counsel. Plaintiffs' request for reconsideration is timely filed, i.e., within 14 days of the Court's order granting partial summary judgment on November 20, 2025. *See* L.R. 7-18.

Plaintiffs base this application on this Notice of Ex Parte Application; the accompanying Memorandum of Point and Authorities; Plaintiffs' supporting evidence, including declarations and exhibits; and any additional papers, evidence, and argument that Plaintiffs may submit. Given the urgency of this matter, Plaintiffs ask that if the Court deems necessary any responsive briefing from Defendants, the Court order briefing on an expedited basis so that the application may be adjudicated at the earliest date possible.

Plaintiffs also provided notice of their ex parte application as required by L.R. 7-19.1 through the conference of counsel on December 1, 2025 by video conference

and subsequent email communications. The parties were unable to reach a resolution of the application. *See* Decl. of Niels Frenzen ¶¶ 2–9.

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Respectfully submitted this 4th day of December, 2025.

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INTRODUCTION

In the last two weeks, this Court held that Defendants-Respondents' ("Defendants'") mandatory, no-bond detention of class members under 8 U.S.C. § 1225(b)(2)(A) violates the Immigration and Nationality Act ("INA"); granted partial summary judgment to the Named Plaintiffs; certified the nationwide class (the "Bond Eligible Class"); and granted declaratory relief requiring that class members receive bond hearings under 8 U.S.C. § 1226(a). Dkt. 81 & 82. Yet Defendants have refused to acknowledge their obligation to provide class members with bond hearings, as this Court ordered.

Plaintiffs-Petitioners ("Plaintiffs") respectfully submit this ex parte application for the Court to reconsider and clarify its recent orders to account for "new material facts" regarding Defendants' noncompliance. *See* L.R. 7-18 & L.R. 7-19. Plaintiffs also make this application pursuant to Fed. R. Civ. P. 60(a) to the extent it corrects a mistake arising from oversight or omission. As explained *infra*, Defendants' stated reason for disregarding this Court's rulings is that the Court has not yet entered a final judgment.[1] Defendants are wrong that this somehow relieves them of their obligations to obey a binding order of the Court. But to eliminate any doubt on this score, and to ensure that class members receive the bond hearings to which they are legally entitled, Plaintiffs ask that the Court grant reconsideration and (1) direct entry of a final judgment under Fed. R. Civ. P. 54(b) as to Counts I and II of the complaint and Count III insofar as the challenged agency actions are "not in accordance with law," Dkt. 15 ¶¶ 99–112, as well as (2) expressly confirm that in granting partial summary judgment and extending relief to the class, the Court's orders vacate the challenged agency actions under the Administrative Procedure Act, 5 U.S.C. § 706(2). Finally, Plaintiffs ask that the Court (3) correct an omission in its

[1] Many immigration judges have also mistakenly asserted that this Court's rulings did not provide declaratory relief on behalf of the class. *See infra*.

order granting class certification and appoint counsel from the ACLU Immigrants' Rights Project and ACLU of Southern California as additional class counsel under Fed. R. Civ. P. 23(g).

Without swift intervention from this Court, Defendants will continue to flagrantly disregard the Court's declaration of the rights of the Bond Eligible Class, and thousands of class members throughout the country will continue to be subject to unlawful detention without a bond hearing despite this Court's prior orders.

STATEMENT OF FACTS

On November 20, 2025, this Court granted partial summary judgment on behalf of the Named Plaintiffs. Dkt. 81 at 17. The Court declined in its summary judgment order to enter a final judgment under Rule 54(b) because it had not yet adjudicated Plaintiffs' requests for class certification and class-wide relief. *See id*. The Court resolved these requests in favor of Plaintiffs soon afterwards, on November 25, 2025, when the Court certified a nationwide class and extended "the same declaratory relief" to the class. Dkt. 82 at 14–15. In extending relief to the class, the Court "declare[d] the rights and other legal relations" of the parties and required the Defendants to provide class members bond hearings. 28 U.S.C. § 2201(a). By statute, this declaration had "the force and effect of a final judgment or decree." *Id*.

Nevertheless, Defendants have persisted in denying class members bond hearings in two ways. First, immigration judges ("IJs")—who fall under Defendant Executive Office for Immigration Review ("EOIR")—have refused to provide bond hearings for the class despite the Court's order granting declaratory relief. *See* Decl. of Emily L. Robinson ¶¶ 6, 9; Decl. of Bonita S. Guiterrez ¶¶ 7–9; Decl. of Robert Barchiesi ¶¶ 7–8; Decl. of Carlos E. Estrada ¶¶ 5–6; Decl. of Jessica Anleu ¶¶ 6, 9; Decl. of Belinda Arroyo ¶¶ 5–6; Decl. of Chantell Abou-Hamdan ¶¶ 6–10; Decl. of Peter Rogers ¶ 6; Decl. of Mayra Lorenzana-Miles ¶ 6; Decl. of Z. Zareefa Khan

¶ 6; Decl. of Hugo Alfaro ¶ 6; Decl. of Rachael A. Méndez ¶ 6; Decl. of Maria Nikolov ¶ 5; Decl. of Christopher Roth ¶ 6; Decl. of James Reyes ¶ 6; Decl. of Megan Day ¶ 6.

Second, IJs have been told—through Department of Justice ("DOJ") internal guidance and by Department of Homeland Security (DHS) attorneys in immigration court—to *disregard* this Court's declaratory judgment requiring bond hearings for the class because this Court has not entered a final judgment under Rule 54(b). *See* Robinson Decl. ¶ 6 (IJ stating "that the Office of Immigration Litigation [(OIL)] had already issued a memorandum from OIL instructing Immigration Judges to hold the position that *Yajure Hurtado* remains good law"); *id*. ¶¶ 9–10 (referencing internal EOIR and DHS guidance); Gutierrez Decl. ¶ 10 (referencing DOJ guidance); Barchiesi Decl. ¶ 7 (referencing internal guidance instructing IJs about lack of final declaratory judgment issued to the certified class); Estrada Decl. ¶ 6 (referencing "position of the Department of Justice"); Arroyo Decl. ¶ 5 (same); *id*. ¶ 6 (describing government attorney's position); Decl. of Niels Frenzen, Ex. A at 3 (government filing in immigration court stating that "because the *Bautista* court has not issued a final judgement, such as vacatur of the policy or declaratory/injunctive relief, there are no immediate ramifications at this time").

As a result, IJs across the country—including in Arizona, California, Florida, Louisiana, Michigan, Nebraska, Nevada, New Jersey, Texas, and Virginia—have refused to abide by this Court's orders. *See* Robinson Decl. ¶¶ 3–9; Gutierrez Decl. ¶¶ 3–11; Barchiesi Decl. ¶¶ 4–8; Estada Decl. ¶¶ 3–6; Anleu Decl. ¶¶ 3–9; Arroyo Decl. ¶¶ 3–6; Abou-Hamdan Decl. ¶¶ 4–10; Rogers Decl. ¶¶ 3–6; Lorenzana-Miles Decl. ¶¶ 3–6; Khan Dec. ¶¶ 3–6; Alfaro Decl. ¶¶ 3–6; Méndez Decl. ¶¶ 3–6; Nikolov Decl. ¶¶ 3–6; Roth Decl. ¶¶ 3–6; Reyes Decl. ¶¶ 3–6; Day Decl. ¶¶ 3–6. IJs have repeatedly issued orders denying bond based on lack of jurisdiction and stated:

> Until and unless the Bautista court issues a class-wide declaratory judgment or injunction, the Bautista court's opinion and partial grant of summary judgment does not constitute a judgment. See, e.g., Fed. R. Civ. P. 54(b) (second sentence).

Anleu Decl. ¶ 6 (attaching IJ order); *see, e.g.*, Khan Decl. ¶ 6 (same); Méndez Decl. ¶ 6 (same); Abou-Hamdan Decl. ¶¶ 8–10 (same); Nikolov Decl. ¶ 5 (same); Roth Decl. ¶ 6 (same); *see also* Estrada Decl. ¶ 6 (quoting IJ order stating that "it appears that the District Court has not at this time issued a class-wide declaratory judgment or injunction"); Arroyo Decl. ¶ 5 (attaching IJ order with same language); Alfaro Decl. ¶ 6 (IJ noting "a final judgment has not been made by the federal court").[2]

Countless members of the Bond Eligible Class are thus languishing in detention without access to bond hearings despite this Court's orders, separated from their families, including young U.S. citizen children and pregnant partners, and forced to defend themselves from removal in detention. *See* Robinson Decl. ¶¶ 8, 11; Gutierrez Decl. ¶¶ 12–13; Barchiesi Decl. ¶¶ 9–13; Estrada Decl. ¶¶ 6–7; Anleu Decl. ¶¶ 6, 9–11; Arroyo Decl. ¶¶ 5, 7; Abou-Hamdan Decl. ¶10–11; Rogers Decl. ¶¶ 6–7; Lorenzana-Miles Decl. ¶¶ 6–7; Khan Decl. ¶¶ 6–7; Alfaro Decl. ¶¶ 6–7; Méndez Decl. ¶¶ 6–7; Roth Decl. ¶¶ 6–7; Reyes Decl. ¶¶ 6–7; Day Decl. ¶¶ 6–7.

ARGUMENT

This Court should not countenance Defendants' refusal to comply with its orders. *See Marbury v. Madison*, 5 U.S. 137, 177 (1803) ("It is emphatically the province and duty of the judicial department to say what the law is."). This is especially so when individual liberty is at stake. Defendants are *already* required by a binding order of this Court to provide class members with bond hearings. But given their refusal to do so, Plaintiffs urge the Court to take the following steps to ensure

[2] The government has taken the same position regarding this Court's rulings in pending habeas actions where class members are seeking bond hearings. *See, e.g.*, Frenzen Decl., Ex. B at 2.

Defendants' compliance with their legal obligations.

First, Plaintiffs renew their request that this Court enter a final judgment under Rule 54(b). *See* Fed. R. Civ. P. 54(b) (permitting the Court to "direct entry of a final judgment as to one or more, but fewer than all, claims . . . only if the court expressly determines that there is no just reason for delay"). As Plaintiffs previously explained, both "'judicial administrative interests as well as the equities involved'" warrant entry of a final judgment here. Dkt. 42 at 41 (quoting *Curtiss-Wright Corp. v. Gen. Elec. Co.*, 446 U.S. 1, 8 (1980)). Indeed, this Court already has decided the merits of Counts I, II, and III in relevant part; certified the nationwide class; and extended relief to class members in an order that has "the force and effect of a final judgment or decree." 28 U.S.C. § 2201(a). The Court originally denied the request for final judgment pursuant to Rule 54(b) because the Court found it inappropriate while the Plaintiffs' motion for class certification was pending. Dkt. 81 at 17. However, the Court then granted the motion for class certification and extended declaratory relief to the Bond Eligible Class. Dkt. 82 at 14. Thus, "the emergence of new material facts" subsequent to the Court's Order provide a basis for the Court to reconsider its prior decision, *see* L.R. 7-18(b); indeed, it is even more urgent that the Court do so given the emergence of other material facts—the government's noncompliance with its legal obligations. *See supra*.

Second, Plaintiffs ask that the Court clarify that, in granting Plaintiffs' motion for partial summary judgment, in addition to granting declaratory relief, this Court's order vacated or "set aside" Defendants' unlawful policies under the APA, including the July 8, 2025 Interim Guidance, Dkt. No. 5-2 at 45–46, and the Board of Immigration Appeals' decision, *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025). Plaintiffs' original motion for partial summary judgment included a request for vacatur of Defendants' policies, *see* Dkt. 42 at 3; Dkt. 42-1 at 3, and the parties briefed the availability of vacatur. *See, e.g.*, Dkt. 61 at 12. Because this Court has

already found Defendants' policies—specifically, the July 8, 2025 Interim Guidance and the BIA's decision in *Yajure Hurtado*—to violate the statute, it should expressly confirm that, in granting summary judgment, it "set aside" those policies as contrary to law. *See* 5 U.S.C. § 706(2)(A) (mandating that the reviewing court "*shall* . . .hold unlawful and set aside" agency action that is "arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law" (emphasis added)); *see also Bridgeport Hosp. v. Becerra*, 108 F.4th 882, 890 (D.C. Cir. 2024) ("When an agency's action is unlawful, vacatur is the normal remedy." (quotation marks omitted)). Notably, the facts have also significantly changed with respect to the sole reason this Court provided for denying Plaintiffs' request to issue a final judgment under Rule 54(b): namely, this Court has since granted class certification. *Compare* Dkt. 81 at 17 *with* Dkt. 82.

Vacatur will eliminate any doubt about the continued viability of *Yajure Hurtado* and July 2025 Interim Guidance by "effectively rescind[ing] the unlawful agency action[s]" and rendering them void. *All. for Hippocratic Med. v. U.S. Food & Drug Admin.*, 78 F.4th 210, 254 (5th Cir. 2023), *rev'd and remanded on other grounds*, 602 U.S. 367 (2024); *see also id*. (explaining that APA vacatur "removes the source of the defendant's authority" to persist in their unlawful actions). Express vacatur of the Board's decision in *Yajure Hurtado* is especially needed as some IJs have mistakenly asserted that "[t]he Partial Motion for Summary Judgment only addresses the DHS Policy and not the Board of Immigration Appeals' ratification of the DHS Policy [in *Yajure Hurtado*]." *See, e.g.*, Frenzen Decl., Ex. C at 1.[3]

[3] Similarly, in related litigation in the Western District of Washington, Defendants have taken the erroneous position that even where a court grants declaratory relief, IJs still may be bound by the BIA's contrary decision denying people bond hearings in *Yajure Hurtado*. *See* Frenzen Decl., Ex. D & E at 22:5-7; 23:2-7; *see also Rodriguez Vazquez v. Bostock*, --- F. Supp. 3d ----, 2025 WL 2782499 (W.D. Wash.

Moreover, to the extent Defendants continue to insist that 8 U.S.C. § 1252(f)(1) prohibits APA vacatur, the Ninth Circuit has made clear that 1252(f)(1)'s bar on class-wide injunctions permits relief under the APA. *See Immigrant Defs. L. Ctr. v. Noem*, 145 F.4th 972, 989–90 (9th Cir. 2025); *see also* Dkt. 61 at 12 (citing additional authorities).

Finally, Plaintiffs ask that the Court appoint My Khanh Ngo, Judy Rabinovitz, Michael K.T. Tan, and Noor Zafar of the ACLU Immigrants' Rights Project and Eva Bitran of the ACLU of Southern California as additional class counsel. *See* Fed. R. Civ. P. 23(g). The Court found that counsel for the ACLU satisfied the adequacy requirements of Rule 23(a)(4), but appears to have inadvertently omitted the above-mentioned attorneys from its order appointing counsel for the class. *See* Dkt. 82 at 11, 15. Thus, Plaintiffs respectfully request that the Court appoint the above-named counsel as class counsel.[4]

CONCLUSION

For the forgoing reasons, Plaintiffs' Ex Parte Application for Reconsideration and Clarification should be granted.

Sept. 30, 2025). Vacatur of the agency's unlawful policies will definitively resolve this dispute.

[4] For reference, counsel for the ACLU provided their qualifications at Dkt. 41-20 and Dkt. 52-1.

Respectfully submitted this 4th day of December, 2025.

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CERTIFICATE OF COMPLIANCE

I, Michael K.T. Tan, certify that this brief does not exceed 2,267 words and complies with the word limit of L.R. 11-6.1.

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